

FY2014 OHIO EPA PUBLIC WATER SYSTEM SUPERVISION PROGRAM
END-OF-YEAR (EOY) SUMMARY
October 1, 2013, through September 30, 2014

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FY 2014 end-of-year evaluation synopsis—Ohio EPA continues to meet requirements to maintain primacy of the drinking water program, and public water systems (PWSs) continue to maintain high compliance rates with drinking water regulations. Analysis of the various programs within Ohio’s drinking water program indicates that public health protection is the top priority. In FY2014, Ohio EPA met and exceeded two of the three national program measures related to community water systems (CWSs) meeting health-based standards ([SDW-SP1.N11](#) and [SDW-SP2](#)). In CY2013 (last measured in April 2014), Ohio met 2 of the 7 [regional shared goal targets](#) related to meeting health-based standards and significant/major monitoring requirements. (The [FY2014 measures and indicators summary](#) provides more details on the results from all of the national and regional measures.) Ohio EPA continues to make significant investments in core aspects of the drinking water program, including sanitary surveys, data management, development of enforcement procedures to ensure consistent implementation, capability assurance, source water protection (SWP) and ground water quality characterization, and development of new rules related to lab reporting requirements, operator certification exams, and other programs. There is a direct correlation between the up-to-date sanitary survey visits to around 4,104 public water systems, low violation rates, innovative programs to ensure compliance, and the dedicated staff in the drinking water program. Staff resources must be maintained to ensure the type of results discussed in this evaluation. Beginning with the January through March 2014 quarter, DDAGW began its total coliform and nitrate administrative penalty program after extensive outreach. By the EOY 2015 report, DDAGW anticipates meeting more program measures. In addition to the PWSS program activities conducted in FY2014 described below, DDAGW continued to expend major resources managing harmful algal bloom (HAB) toxins in PWSs. DDAGW continues to work with PWSs to monitor raw and finished water in accordance with Ohio’s HAB strategy. DDAGW had its second “Do Not Drink” advisory based on finished water detections on a Lake Erie system. DDAGW worked with many state, federal, and academic partners during federal fiscal year (FFY) 2014 to expand knowledge and research into HABs. DDAGW revised its Water Supply Revolving Loan Account (WSRLA) Project Management Plan to offer one million dollars in grants for cyanotoxin monitoring and analysis and 0% loans for infrastructure improvements for treatment and abatement options for public water systems.

1. **Rules and primacy**—Ohio EPA is implementing all of the drinking water rules, with the exception of a few [program disinvestments](#). Ohio does not yet have primacy for the arsenic rule, Long Term 2 Enhanced Surface Water Treatment Rule (LT2), Ground Water Rule (GWR), and Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2). However, Ohio has interim primacy for all of these rules. Region 5 will determine whether primacy applications are complete, track

primacy submittal/review for all rules, and provide comments on draft rules, as requested. Region 5 completed review of LT1 and LCRSTR and corresponded with Ohio EPA about necessary revisions. Ohio's primacy for LT1 and LCRSTR became effective on May 23, 2014. R5 agrees to provide Ohio EPA with correspondence on necessary revisions to LT2, Stage 2 D/DBPR, arsenic rule, and GWR by December 31, 2015.

In FY14, Region 5 is tracking [state reporting of certain rule violations](#) (LT2, GWR, LCRSTR, and Stage 2 D/DBPR, as well as 141.130(c) operator certification treatment technique violations). As of October 2014, Ohio had reported to the federal version of the Safe Drinking Water Information System (SDWIS/FED):

- LT2: 25 TT violations
- GWR: 3 TT violations, 360 M/R violations, and 1 other violation
- Stage 2: 23 MCL violations and 178 M/R violations
- LCRSTR: 451 M/R violations
- Stage 1: 0 (type 12—"failure to have a certified operator") violations

In FY 2014, Ohio EPA's DDAGW continued to work on standard operating procedures (SOPs) for many primacy programs. By working on the GWR SOP, DDAGW established improved assessment tools through the hydrogeologic sensitivity assessments and guidance on requiring assessment source water monitoring. DDAGW has also developed an SOP for rescinding and returning violations to compliance, which should improve SDWIS data quality and consistency.

2. **Sanitary surveys**—Ohio EPA will maintain a baseline core of individuals with the technical expertise needed to perform sanitary surveys. Ohio will ensure that sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule. Region 5 will track state commitments to conduct sanitary surveys within the federally required intervals through a [sanitary survey completeness high priority query](#), as well as the [national water program measure](#), SDW-01a, which was modified in FY2014 to include both surface water and ground water systems:

- SURFACE WATER SYSTEMS: As of October 2014, 85.92% (238 out of 277) of the sanitary surveys at surface water CWSs were completed between CY2012 and CY2014. In addition, 100% of the surface water non-transient, non-community water systems (NTNCWSs) (8) and transient, non-community water systems (TNCWSs) (7) have completed sanitary surveys between CY2010 and CY2014. States have until March 2015 to report CY2014 sanitary survey data for the national measure SDW-01a. This measure was modified in FY2014 to include ground water systems in addition to the surface water systems previously tracked.
- GROUND WATER SYSTEMS: As of October 2014, 86.65% of the ground water CWSs (811 out of 936) completed sanitary surveys between CY2012 and CY2014. In addition, 92.74% of the ground water NTNCWSs (588 out of 634) and 93.2% of the ground water TNCWSs (2,452 out of 2,631) have completed sanitary surveys between CY2010 and CY2014.

During FFY 2014, DDAGW implemented a staff rotation for inspections and began drafting an oversight/auditing process to ensure quality, consistent inspections. DDAGW also revised its significant deficiency policy for surface water systems and began a sanitary survey workgroup to assist in consistently identifying and following up on survey requirements.

In state fiscal year (SFY) 2014, DDAGW investigated a replacement for the SDWIS/State Electronic Sanitary Survey (ESS) application for sanitary survey data management. In SFY 2015, DDAGW will begin implementation of the Safe Water Information Field Tool (SWIFT).

3. **Laboratory certification**—The state is expected to: (1) establish and maintain a state program for the certification of laboratories that analyze drinking water contaminants, and (2) assure availability of certified laboratory facilities capable of analyzing all contaminants in the state primary drinking water regulations. The Ohio EPA certification program is managed by their state lab in Ohio EPA's Division of Environmental Services (DES) Laboratory Certification Section. Ohio EPA agrees to certify all laboratories that produce results for compliance with SDWA at least once every three years and will meet all requirements of 40 CFR parts 141 and 142. In FY2013, DDAGW expanded the laboratory compliance program, which should assist in compliance by reducing late reporting while improving data quality reporting. During December 2013, Region 5 conducted an audit of the Ohio EPA principle state lab. Findings and certification decisions were issued in April 2014. According to the 2014 annual Region 5 laboratory certification program assessment, Ohio doesn't anticipate any laboratory capacity issues for any of the regulated drinking water contaminants or any resource issues. In FFY 2014, the laboratory analyzed approximately 500 samples for cyanotoxins for many public water systems. DDAGW and the laboratory developed a standard operating procedure for performing ELISA cyanotoxin analysis.
4. **Compliance and enforcement management**—Ohio EPA is expected to evaluate compliance with all drinking water rules and respond to violations by providing compliance assistance or enforcement as appropriate. Ohio EPA is also expected to keep adequate records of pertinent state decisions. Region 5 continues to look to states to refer noncompliant PWS. Ohio referred four systems to Region 5 that had not issued CCRs (with type 71 violations) on March 28, 2013, all four of which have been returned to compliance (RTC'd). R5 provided comments on [Ohio EPA's Compliance Assurance through Enforcement Program SOP](#) in June 2012, and Ohio sent the final version in May 2013. Minor revisions were made and an updated version was sent to Region 5 in October 2014. Ohio EPA is commended for incorporating the ERP/ETT in its strategy. Ohio's drinking water program revised its [DDAGW Enforcement SOP](#), which includes protocols for RTC'ing and significant deficiencies, to include more details to address the region's comments and sent this SOP to Region 5 in March 2013. Ohio EPA's SOPs are comprehensive and well organized. DDAGW continued to emphasize compliance in FY 2014 by developing Streamlined Orders for systems with certified operator violations and total coliform and nitrate monitoring violations. For the first time, according to Ohio's data, Ohio has met shared goal 7 (less than 10 percent of TNCWSs with significant/major monitoring violations) in FFY 2014. Ohio calculates that 7.89% of TNCWSs had significant/major monitoring violations. R5 will be calculating the CY 2014 shared goal results in April 2015 with SDWIS/Fed data.

ENFORCEMENT TARGETING TOOL: Region 5 tracks state commitments under measure SDWA02 and updates Ohio EPA quarterly. Ohio's 2014 commitment was to address or resolve 42 systems. As of July 2014, Ohio addressed 79 systems (33 from the original 42 on the fixed base list plus an additional 46 that were more recently ≥11). Ohio is commended for this accomplishment. Ohio's 2015 commitment is to address or resolve 47 systems.

LOGIC MODEL REPORTING TOOL (LMRT): As of July 2014, the LMRT indicator O6(1)—the number and percent of all violations responded to per year—shows that 78 percent of all violations (8,161) that occurred in the five-year period 2009-2013 were reported "returned-to-

compliance.” As of 2013, there were 93 violations at 40 systems with violation years from 2009 to 2012 with no response reported. Only 1 of these violations was health-based.

As of July 2014, the LMRT indicator O6(2)—the estimated median time (in days) between the proxy violation awareness date and violation response—indicates that between 2009 and 2013, Ohio reported a first response to 90 percent of all violations within 60 days or less of the proxy violation awareness date, which is an increase from 87 percent compared to the previous (2008 to 2012) data. Between 2009 and 2013, Ohio reported a first response to 90 percent (146 violations) of the PN tier 1 violations within 30 days or less of the proxy violation awareness date—an increase of 3 percentage points compared to the previous (2008 to 2012) data. Ohio reported a first response to 69 percent (112 violations) of the PN tier 1 violations within 1 week, which is an increase of 4 percentage points compared to the previous (2008 to 2012) data. The first response to three acute TCR MCL violations took longer than two months.

As of July 2014, the LMRT indicator O6(2b)—the time (in days) between the proxy violation awareness date to the return-to-compliance (RTC) date—indicates that the majority of all violations that occurred between 2009 and 2013—84 percent (6,851 violations)—were RTC’d within one year. The majority of tier 1 violations that occurred between 2009 and 2013—93 percent (136 violations)—were RTC’d within one year, which is a significant increase from 84 percent from the previous (2008 to 2012) data. Of the tier 1 violations that took longer than one year to RTC, three were acute TCR MCL violations, and seven were monthly turbidity exceedances.

5. **Data management and reporting**—Ohio EPA is expected to maintain a data management system that tracks requirements for all drinking water rules, which includes the appropriate combination of hardware, software, and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN, and public information requirements. States must report to EPA actions and sample data quarterly and inventory data at least annually in accordance with 40 CFR 142.15. Ohio EPA is using SDWIS/State 3.2 and is reporting with FedRep 3.4. Ohio is commended for being up-to-date on SDWIS/State software upgrades. Ohio continues to meet the quarterly deadlines for reporting data to the national database, SDWIS/Fed-ODS. Ohio is commended for their commitment to improving data quality in the national data system by consistently correcting the errors identified on the national database error reports.

In state fiscal year (SFY) 2014, DDAGW investigated a replacement for the SDWIS/State Electronic Sanitary Survey (ESS) application for sanitary survey data management. In SFY 2015, DDAGW will begin implementation of the GEC Safe Water Information Field Tool (SWIFT). DDAGW has also developed an SOP for rescinding and returning violations to compliance, which should improve SDWIS data quality and consistency. R5 appreciated Ohio’s assistance in preparing for the October 2014 on-site joint file review and enforcement verification (EV). Ohio EPA management and staff have also been extremely helpful and responsive to R5’s follow-up questions as we work to analyze the data and draft the report. R5 expects to send a draft joint review report to Ohio in February.

TCR AND NITRATE REPORTING: Region 5 is tracking late reporting of TCR and nitrate violations, and as of October 2014, the CY2012 to CY2013 [TCR late reporting query](#) indicates that 99.8% of TCR violations were reported on time in 2012 (2012 total: 1,037), and 99.5% of TCR violations were reported on time in 2013 (2013 total: 885). Ohio is commended for this achievement. As

of October 2014, the CY2012 to CY2013 [nitrate late reporting query](#) indicates that 83.1% of nitrate violations were reported on time in 2012 and 16.9% were reported one quarter late (2012 total: 77). In 2013, 82% of nitrate violations were reported on time, and 18% were reported one quarter late (2013 total: 89).

6. **Security**—Ohio EPA is expected to adopt and implement an adequate plan for the provision of safe drinking water under emergency circumstances including, but not limited to, earthquakes, floods, hurricanes, and other natural disasters. Region 5 will review state emergency water plans and consult with the state on implementation capabilities. During FFY 2014, DDAGW re-organized and added a position to the table of organization to assist in improving our emergency response. Staff will be added during FFY 2015.
7. **Operator certification**—Ohio EPA establishes and maintains minimum professional standards for the operation and maintenance of all public water systems to ensure that properly trained and certified professionals are overseeing the treatment and distribution of safe drinking water and to promote compliance. Ohio annually—by September 30th each year—provides documentation to EPA showing the ongoing implementation of the program to avoid 20% withholding of the DWSRF grant. [Annual reports](#) must include operator certification reporting measures.

Ohio's implementation of the operator certification program complies with the requirements of the federal operator certification guidelines. Ohio continues to recognize the importance of properly trained and certified operators in protecting public health. Activities taken by Ohio EPA to ensure operators are appropriately certified include overseeing the certification of 5,033 drinking water operators with active certificates. During SFY 2014, 98 percent of operators were properly certified; 78 classified facilities were without an appropriately certified operator. Ohio is commended for maintaining a consistent number of certified operators, particularly in light of the conclusion of the federal Expense Reimbursement Grant in 2012.

In FY 2013, the certified operator program expanded its examination process to allow third party providers. While the examinations began in FY 2014, rule changes and program development occurred in FY 2013. During FFY 2014 approximately 450 operators took advantage of the third party examinations. Ohio EPA is commended for offering more frequent certification examinations in more locations across the state. DDAGW also began implementing a new compliance program for systems without operators in FFY 2013 and continued the program in 2014. Ohio EPA is commended for initiating new enforcement procedures to deal with systems without a certified operator. In 2013, Ohio EPA issued nine sets of the new streamlined orders, which resulted in 100% return to compliance.

8. **Capacity development**—Ohio EPA ensures that new and existing CWSs/NTNCWSs can demonstrate technical, managerial, and financial capacity to operate in compliance with federal and state regulations. Ohio annually—by September 30th each year—provides documentation to Region 5 showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. The [annual report](#) should address the new capacity development reporting measures. Every three years, states are required to submit a report to the governor and provide a copy to R5 on the efficacy of the strategy and the progress made toward improving the capacity of water systems in Ohio. Ohio completed this report in September 2014. The next report to the governor is due October 1, 2017.

DDAGW worked on expanding its capability program in FY 2013 and conducted an overall program re-assessment. As a result, a work group is working through each process to improve capability. The major focus for FY 2013 was drafting screening tools for CWSs and NCWSs to assess general capability. The screening tools will be used to determine what existing systems need to complete a capability assurance plan (CAP). In SPY 2014, the CAP screening tool was piloted on Water Supply Revolving Loan Account (WSRLA) loan applicants. Staff and RCAP were trained on the screening tool. Ohio EPA is commended for continuing to implement an effective capability assurance program and for continuing to identify new opportunities to increase system capability.

The Drinking Water Assistance Fund (DWAF) program includes incentives in the DWSRF point structure for effective management, such as utility board training requirements associated with loan awards, conservation, preventative maintenance, regionalization/consolidation, backflow prevention programs, contingency plans, endorsed protection plans, asset management plans, impacts from harmful algal blooms (HABs), and projects consistent with sustainable growth plans. A specific targeted fund for auxiliary power was included in SPY 2014. SPY 2015 includes targeted funds to cyanotoxin grants and HAB infrastructure loans. Ohio EPA uses the DWSRF small systems technical assistance set-aside to fund a contract with Great Lakes RCAP to assist PWSs serving 10,000 people or less with increasing their technical, managerial, and financial capacity, for example, by conducting energy audits and providing training to local officials on asset management and maximizing system efficiency and sustainability with reduced resources, including free, online training available to the public.

9. **Source water assessments and protection**—Ohio EPA’s SWP program is funded by the DWSRF state program management or PWSS set-aside and state drinking water fees. Ohio EPA reports the number of CWSs with minimized risk because of substantial implementation of SWP, as well as the number of people served by CWSs with minimized risk as of June 30 by August 15 each year. Ohio EPA reported this information electronically via SDWIS in FY14. In October 2014, Ohio reported that the next quarterly update of SDWIS will include this information as Source Water Protection Implementation milestones. Ohio’s program is voluntary. Ohio EPA updates source water assessments, as resources allow, and completes source water assessment reports for new public water systems—Ohio completed 145 source water assessment reports in SPY 2014. Ohio EPA also developed a methodology for estimating substantial implementation of municipal systems from an online “SWAP Implementation Report” of more than 500 moderate to high vulnerability CWSs. The report is provided in a questionnaire format every three years, and approximately 30% of the systems are visited by District SWAP staff each year to audit the reports and discuss local progress. Ohio EPA DDAGW also assists Ohio EPA’s Division of Surface Water in assessing surface waters designated as a public water supply beneficial use. Ohio’s 2014 integrated water quality report included cyanotoxin data from 2008 to 2012 as one of the drinking water beneficial use impairment indicators for Lake Erie intakes and all other public water systems with river/lake intakes. In FY2014, GWDWB provided comments on Ohio’s 2014 integrated report and state nonpoint source management plan.

NATIONAL MEASURES SP4A AND SP4B: Ohio EPA reported SWP substantial implementation information and surpassed both of the FY 2014 SWP commitments. Specifically, Ohio minimized risk to public health through SWP for 50% of CWSs (2014 target: 43%) and 66% of the population served by CWSs (2014 target: 66%), where “minimized risk” is achieved by substantial implementation, as determined by the state, of actions in a SWP strategy.

10. **Measures and indicators**—There are multiple [national water program measures](#) in the national program manager guidance that support the “water safe to drink” subobjective 2.1.1 in EPA’s strategic plan, and Region 5 is also tracking several other measures, including those in the [logic model reporting tool](#), [Region 5 shared goals](#), and [Region 5 high priority SDWIS/FED queries](#). The most recent data for Ohio for each of these measures are available via the “measures and indicators” summary file, some of which have been described above in this work plan summary.
11. **Resources and expertise**—Ohio EPA maintains a baseline core of individuals with the technical expertise to carry out all mandatory components of the PWSS program (including engineering plan and specification review and emergency response). Contracts with third parties conducting mandatory components of the PWSS program will make performance expectations clear and will be measured and evaluated by Ohio EPA. Ohio EPA develops and implements a plan to provide adequate funding to carry out all functions of the PWSS program. Region 5 tracks progress related to state and EPA efforts to obtain additional resources necessary to enable Ohio EPA to engage in resolving temporary [program disinvestments](#).

FINAL—MARCH 17, 2015

FY2014 Ohio EPA PWSS Rules and Primacy EOY Summary

October 1, 2013 through September 30, 2014

Federal funding used: PWSS grant and DWSRF SSTA, PWSS, and administration and technical assistance set-asides

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NOTE: To use the Quickr links below to access the files, move the cursor over the link and hold down the "Ctrl" key while clicking the left mouse button.

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
1 – SWTRs	SWTR, IESWTR, FBRR, and LT1: primacy LT2: interim primacy; LT2 application under review	<u>Ohio EPA</u> Judy Stottsberry judy.stottsberry@epa.ohio.gov ; (614) 644-3050 <u>U.S. EPA Region 5</u> Andrea Porter porter.andrea@epa.gov ; (312) 886-4427	<u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP <u>State Commitment</u> Complete. <u>Region 5 Assistance</u> R5 approved the FBRR primacy package on 1/25/13 and the LT1 primacy package on 5/23/14. R5 is reviewing the LT2 application. OGWDW issued guidance dated February 4, 2010, recommending a revised <i>E. coli</i> trigger value of 100 cfu/100 mL for small systems to conduct <i>Cryptosporidium</i> monitoring; this guidance was released after the state submitted their primacy application to R5. R5 used this trigger level during early	<u>Discrepancies</u> None. <u>Milestones</u> Ohio revised the definition of PWS and water source designation rule language. R5 provided comments in 2012 and 2014 on the revised language, and Ohio responded to those comments. Ohio submitted a final primacy revision package for LT2 on 12/4/12. Ohio is reporting LT2 TT violations. As of October 2014, 25 TT violations were reported to SDWIS/Fed. Ohio EPA 2014 EOY: Ohio EPA revised its approach to surface water significant deficiencies and drafted a revised policy. DDAGW sent letters to the Schedule 1 (9 public water systems) and Schedule 2 systems (8 public water systems) notifying them of their requirements for the second round of source water monitoring. DDAGW has accepted three sampling plans to date and is expecting to receive the remainder of

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			implementation in Ohio during Round 1 LT2 monitoring for Schedule 4 systems, and Ohio is allowed to use this trigger level during Round 2 for Schedule 4 systems. This work plan documents a change to the ongoing implementation of this rule, which will be filed with the original primacy application to R5.	sampling plans from the Schedule 1 systems by January 1, 2015.
2 – TCR	primacy (TCR)	<p><u>Ohio EPA</u> Mark Sheahan mark.sheahan@epa.ohio.gov (614) 644-4827</p> <p><u>U.S. EPA Region 5</u> Miguel Del Toral deltoral.miguel@epa.gov (312) 886-5253</p>	<p><u>Federal Expectations</u> See the state's schedule for implementing the RTCR in the State Commitment section below.</p> <p>See also the federal expectations file: Quickr link to Ohio FY2014 ARDP</p> <p><u>State Commitment</u> TCR: complete; RTCR: Ohio EPA anticipates seeking interested party comment early 2015, and adopting rules by end of 2015 to be effective 4/1/16.</p> <p><u>Region 5 Assistance</u> RTCR—Since R5 states are tailoring RTCR implementation, training by R5 for all six states would not be as valuable to the</p>	<p><u>Discrepancies</u> None.</p> <p><u>Milestones</u> Ohio EPA 2014 EOY: Workgroup worked on preparing RTCR, both rules, and implementation issues. Anticipate seeking interested party comment in early 2015 and adopting rules by end of 2015 to be effective 4/1/16. Also, new penalty program for failure to monitor for total coliform and nitrate began implementation 1/1/14. Outreach for new penalty program conducted during FFY13 already resulting in improved compliance rates.</p>

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			<p>state. EPA headquarters has provided national training, and R5 will continue to participate in state-specific training, to the extent possible.</p> <p>R5 approved the TCR/PN revisions primacy package on 1/25/13.</p>	

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3 – GWR	interim primacy; application under review	<p>Ohio EPA Mark Sheahan mark.sheahan@epa.ohio.gov (614) 644-4827</p> <p>U.S. EPA Region 5 Mostafa Nouredin nouredin.mostafa@epa.gov; (312) 353-4735</p> <p>Andrea Porter porter.andrea@epa.gov; (312) 886-4427</p> <p>Joe Janczy janczy.joseph@epa.gov; (608) 267-2763</p>	<p><u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP</p> <p><u>State Commitment</u> Complete.</p> <p><u>Region 5 Assistance</u> R5 is reviewing the GWR application. Ohio sent the GWR primacy package without AG certification on 11/30/10, and AG certification was received on July 24, 2014.</p>	<p><u>Discrepancies</u> None.</p> <p><u>Milestones</u> Ohio EPA is using SDWIS/State 3.2 and FedRep 3.4, the latest version of FedRep, to report to SDWIS/Fed ODS. Ohio is currently working on an SOP to ensure consistent reporting of GWR violations.</p> <p>Ohio is reporting GWR violations. As of October 2014, the following violations were reported to SDWIS/Fed: 3 TT violations, 360 M/R violations, and 1 other violation.</p> <p>Ohio EPA is developing guidance for significant deficiencies, which are identified through sanitary surveys. Until guidance is developed, significant deficiencies will be determined on a case-by-case basis.</p> <p>Ohio EPA 2014 EOY: GWR SOP is drafted and undergoing final editorial revisions. Significant deficiency guidance is still in development. Based on the surface water policy, consideration will be given to unify the process—including sanitary defects—in the RTCR.</p>
4 – NO ₂ /NO ₃	primacy	<p>Ohio EPA Wendy Sheeran wendy.sheeran@epa.ohio.gov; (614) 644-2752</p>	<p><u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP</p> <p><u>State Commitment</u> Complete.</p>	<p><u>Discrepancies</u> None.</p> <p><u>Milestones</u> None.</p> <p>Ohio EPA 2014 EOY: New penalty program for failure to monitor for total coliform and nitrate began implementation 1/1/14.</p>

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
5 – LCR	LCR, LCRMR, and LCRSTR: primacy	<p><u>Ohio EPA</u> Ken Baughman kenneth.baughman@epa.ohio.gov; (614) 644-2915</p> <p><u>U.S. EPA Region 5</u> Miguel Del Toral deltoral.miguel@epa.gov; (312) 886-5253</p>	<p><u>Federal Expectations</u> States to provide comments on the proposed LCR long-term revisions (LCRLTR), as appropriate.</p> <p>See also the federal expectations file: Quickr link to Ohio FY2014 ARDP</p> <p><u>State Commitment</u> Complete.</p> <p><u>Region 5 Assistance</u> The LCRLTR proposed rule date is TBD. R5 will provide training on the proposal and requests for comment.</p> <p>R5 approved the LCRSTR primacy package on 5/23/14.</p> <p>R5 continued to work on addressing some of the consumer notice violations at three schools and day cares that are PWSs through the small system initiative that had not yet been returned to compliance.</p>	<p><u>Discrepancies</u> None.</p> <p><u>Milestones</u> Ohio is reporting LCRSTR violations. As of October 2014, 451 M/R violations were reported to SDWIS/Fed.</p> <p>Ohio EPA 2014 EOY: Lead and copper SOP in development. Continued to coordinate with R5 on small system initiative, which is now being implemented through the ETT/ERP process. R5 is requesting referrals from Ohio EPA to follow-up and provide compliance assistance to systems—especially schools and daycares—that have open lead consumer notice violations.</p>
6 – D/DBPRs	<p>Stage 1: primacy</p> <p>Stage 2: interim primacy;</p>	<p><u>Ohio EPA</u> Mike Deal mike.deal@epa.ohio.gov; (614) 644-3387</p> <p><u>U.S. EPA Region 5</u></p>	<p><u>Federal Expectations</u> In addition to the other D/DBPR requirements, electronically report all MCL, M/R TT and PN violations and inventory updates to</p>	<p><u>Discrepancies</u> Yes, acknowledged (regarding reporting type 12 violations for failure to have a certified operator as required by Stage 1). Ohio does issue federal violations for failure to have an operator, but they</p>

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
	application under review	Mostafa Nouredin nouredin.mostafa@epa.gov ; (312) 353-4735	SDWIS/Fed for all public water systems, including operator certification treatment technique violations per 141.130(c). See also the federal expectations file: Quickr link to Ohio FY2014 ARDP <u>State Commitment</u> Complete.	are not D/DBP TT violations. See also Quickr link to draft list of program disinvestments . <u>Milestones</u> Ohio EPA submitted the Stage 2 primacy package to R5 on January 18, 2013, per R5's request, even though the AG certification had not yet been received. The AG certification was received on July 29, 2014. Ohio is reporting Stage 2 violations. As of October 2014, the following violations were reported to SDWIS/Fed: 23 MCL violations and 178 M/R violations. Ohio EPA 2014 EOY: MCL violations under Stage 2 monitoring are occurring and are being addressed, including through enforcement actions where necessary. Chem/rad SOP under revision to incorporate Stage 2 revisions.
7 – IOCs	primacy, except for the new arsenic rule arsenic rule: interim primacy; application under review	<u>Ohio EPA</u> Kathy Pinto kathy.pinto@epa.ohio.gov ; (614) 644-3558 <u>U.S. EPA Region 5</u> Miguel Del Toral deltoral.miguel@epa.gov ; (312) 886-5253 As: Kim Harris harris.kimberly@epa.gov ; (312) 886-4239	<u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP <u>State Commitment</u> Complete.	<u>Discrepancies</u> None. <u>Milestones</u> Ohio EPA submitted a second addendum to the 2007 primacy application for the arsenic rule (related to corrections made by 8/1/10) on 10/26/12 per Region 5's request, and R5 received the AG certification in August 2014. As of January 2014, 3 systems had arsenic MCLs that were not RTC'd, including 0.16% of CWSs (2 out of 1,224) and 0.15% of NTNCWSs (1 out of 214,671). There were no TNCWSs with arsenic violations not RTC'd. (Note: This query will be

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
				updated in January 2015 with the January data freeze.)
8 – Radio-nuclides	primacy	<p>Ohio EPA Wendy Sheeran wendy.sheeran@epa.ohio.gov; (614) 644-2752</p> <p>U.S. EPA Region 5 Miguel Del Toral deltoral.miguel@epa.gov; (312) 886-5253</p>	<p><u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP</p> <p><u>State Commitment</u> Complete.</p>	<p><u>Discrepancies</u> None.</p> <p><u>Milestones</u> Ohio's radionuclides primacy package submitted on February 5, 2009, was approved on May 9, 2012.</p>
9 – SOCs	primacy	<p>Ohio EPA Wendy Sheeran wendy.sheeran@epa.ohio.gov; (614) 644-2752</p> <p>U.S. EPA Region 5 Miguel Del Toral deltoral.miguel@epa.gov; (312) 886-5253</p>	<p><u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP</p> <p><u>State Commitment</u> Complete.</p>	<p><u>Discrepancies</u> None.</p> <p><u>Milestones</u> None.</p>
10 – VOCs	primacy	<p>Ohio EPA Mike Deal mike.deal@epa.ohio.gov; (614) 644-3387</p> <p>U.S. EPA Region 5 Miguel Del Toral deltoral.miguel@epa.gov; (312) 886-5253</p>	<p><u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP</p> <p><u>State Commitment</u> Complete.</p>	<p><u>Discrepancies</u> None.</p> <p><u>Milestones</u> None.</p>
11 – Sodium	N/A	<p>Ohio EPA Holly Kaloz holly.kaloz@epa.state.oh.us; (614) 644-2760</p> <p>Mike Perriguet</p>	<p><u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP</p> <p><u>State Commitment</u></p>	<p><u>Discrepancies</u> None. Ohio EPA is not implementing this rule. There is not a federal MCL or requirement to perform sodium monitoring. Ohio would have to adopt rules more stringent than the federal rules to require sampling. Ohio doesn't intend to adopt rules for sodium. Sodium is required for new well</p>

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
		mike.perriguey@epa.state.oh.us ; (614) 644-3124 U.S. EPA Region 5 Miguel Del Toral deltoral.miguel@epa.gov ; (312) 886-5253	Complete.	approval. Ohio references the federal guidance level of 20 mg/L in letters regarding new well results. <u>Milestones</u> None.
12 – PN	primacy	Ohio EPA Holly Kaloz holly.kaloz@epa.state.oh.us ; (614) 644-2760 Mike Perriguey mike.perriguey@epa.state.oh.us ; (614) 644-3124 U.S. EPA Region 5 Kristina Bell bell.kristina@epa.gov ; (312) 886-7489	<u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP <u>State Commitment</u> Partial. <u>Region 5 Assistance</u> R5 approved the TCR/PN revisions primacy package on 1/25/13.	<u>Discrepancies</u> Yes, acknowledged (regarding not reporting PN tier 2 and tier 3 violations). See also Quickr link to draft list of program disinvestments . Region 5 tracks progress related to state and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments. <u>Milestones</u> Ohio has trained staff and is using SDWIS/State to track and create PN schedules. Ohio has begun issuing violations for Tier 1 PN violations and is continuing to work on providing consistent application of the program across the state. Ohio EPA reports federal Tier 1 PN violations. Ohio EPA does track the request for PN and when the PN is received for Tier 2 and 3 violations, but does not report these PN violations. Ohio will not expand the PN violation program until full implementation of the Tier 1 program is complete.
13 – CCR	primacy	Ohio EPA Holly Kaloz holly.kaloz@epa.state.oh.us ; (614) 644-2760 U.S. EPA Region 5 Janet Kuefler	<u>Federal Expectations</u> See the federal expectations file: Quickr link to Ohio FY2014 ARDP <u>State Commitment</u> Partial.	<u>Discrepancies</u> Yes, acknowledged (related to reviewing CCR content and reporting violations). Ohio EPA conducts content reviews for specific CCRs based on priority targeting criteria and sends notices of violation (NOVs) for incorrect CCRs. However, Ohio EPA does not report content violations to U.S.

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
		kuefler.janet@epa.gov ; (312) 886-0123	<u>Region 5 Assistance</u> A memorandum signed on January 3, 2013, clarifies electronic delivery options for CCRs (click this link).	<p>EPA. NOV's are sent to systems failing to issue a CCR, and Ohio reports these violations to U.S. EPA. Further enforcement is not prioritized unless included as part of another enforcement action. See also Quickr link to draft list of program disinvestments. Region 5 tracks progress related to state and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments.</p> <p><u>Milestones</u> Ohio referred four systems to Region 5 that had not issued CCRs (with type 71 violations) on March 28, 2013. All four systems have been returned to compliance (RTC'd) as of May 2014.</p>

FY2014 OHIO EPA PWSS PROGRAM SANITARY SURVEY END-OF-YEAR (EOY) SUMMARY

FINAL—MARCH 17, 2015

FY2014 Ohio EPA PWSS Program Sanitary Survey EOY Summary October 1, 2013 through September 30, 2014 Federal funding used: PWSS grant	
State Contact	Andy Barienbrock, andrew.barienbrock@epa.ohio.gov , (614) 728-1216
EPA Region 5 Contact	Mostafa Nouredin, noureldin.mostafa@epa.gov , (312) 353-4735
Expectations	<p>Ohio EPA will maintain a baseline core of individuals with the technical expertise needed to perform sanitary surveys.</p> <p>Ohio EPA will ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.</p> <p>Ohio EPA will ensure that under the Ground Water Rule, sanitary surveys at ground water systems include an evaluation of the: (1) source; (2) treatment; (3) distribution system; (4) finished water storage; (5) pumps, pump facilities, and controls; (6) monitoring, reporting, and data verification; (7) system management and operation; and (8) operator compliance with state requirements.</p> <p>See also the federal expectations file: Quickr link to Ohio FY2014 ARDP</p>
Region 5 Assistance	Track state commitments under measure SDWA-01a and update Ohio EPA quarterly, engaging in discussion with states on progress as needed. (NOTE: This national measure was modified in FY14 to include both surface water and ground water systems.) Help arrange training as requested. See also the federal expectations file link above.
Discrepancies	<p>Yes, acknowledged. Ohio EPA is not reporting sanitary survey violations at systems when the state does not conduct a sanitary survey within the federally required intervals. In addition, Ohio EPA will not commit to electronically tracking how many systems either have met or are meeting the requirement that systems notify the state in writing within 45 days that IESWTR deficiencies identified in the sanitary surveys are corrected. See the Quickr link to Ohio PWSS program disinvestments.</p> <p>Region 5 tracks progress related to state and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments.</p>
Milestones	None.
Self-Assessment and Evaluation	<p>Tracking responses to sanitary surveys—some district offices use a separate survey schedule tracker and other district offices have individual inspectors tracking.</p> <p>SURFACE WATER SYSTEMS: As of October 2014, 85.92% (238 out of 277) of the sanitary surveys at CWSs were completed between CY2012 and CY2014. In addition, 100% of the surface water NTNCWSs (8) and TNCWSs (7) have completed sanitary surveys between CY2010 and CY2014. States have until March 2015 to report CY2014 sanitary survey data for the national measure SDW-01a. This measure was modified in</p>

FY2014 OHIO EPA PWSS PROGRAM SANITARY SURVEY END-OF-YEAR (EOY) SUMMARY

	<p>FY14 to include ground water systems in addition to the surface water systems previously tracked.</p> <p>GROUND WATER SYSTEMS: As of October 2014, 86.65% of the ground water CWSs (811 out of 936) completed sanitary surveys between CY2012 and CY2014. In addition, 92.74% of the ground water NTNCWSs (588 out of 634) and 93.2% of the ground water TNCWSs (2,452 out of 2,631) have completed sanitary surveys between CY2010 and CY2014.</p> <p>Ohio EPA 2014 EOY: Surveys conducted during FFY 2013 and 2014 met the eight survey components. During FFY 2014, Ohio conducted a total of 1,111 sanitary surveys; 398 at CWSs, 141 at NTNCWSs, and 572 at TNCWSs, including 35 at surface water systems.</p> <p>Ohio EPA is improving its inspections by implementing an inspector rotation and developing guidance on field audits conducted by the districts and central office. In addition, in FFY 2014 Ohio EPA began a workgroup to more consistently identify and follow up on sanitary survey inspections. DDAGW added a manager and a staff person to assist with the oversight role.</p> <p>In state fiscal year (SFY) 2014, DDAGW investigated a replacement for the SDWIS/State Electronic Sanitary Survey (ESS) application for sanitary survey data management. In SFY 2015, DDAGW will begin implementation of the Safe Water Information Field Tool (SWIFT).</p>
Relevant Attachments	<p>Quickr link to Ohio EPA's capability assurance evaluation form (10/08), which is used during sanitary surveys.</p> <p>Quickr link to Ohio EPA's sanitary survey form.</p> <p>Quickr link to Ohio EPA's sanitary survey manual. As of December 2013, significant deficiency guidance was in development.</p> <p>See also Ohio's sanitary survey guidance for small systems and a Ohio Section AWWA 2007 newsletter article about Ohio's sanitary survey process change.</p>

FY2014 OHIO EPA PWSS PROGRAM LABORATORY CERTIFICATION END-OF-YEAR (EOY) SUMMARY

FINAL—MARCH 17, 2015

FY2014 Ohio EPA PWSS Program Laboratory Certification EOY Summary October 1, 2013 through September 30, 2014 Federal funding used: PWSS grant	
State Contact	Nik Dzamov Ohio EPA Division of Environmental Services (DES) Laboratory Certification Section nikola.dzamov@epa.ohio.gov (614) 644-4068
EPA Region 5 Contact	Frank Lagunas, Laboratory Certification Program Manager lagunas.frank@epa.gov (312) 886-4466
Expectations	<p>All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 C.F.R. parts 141 and 142.</p> <p>EPA recommends that the State have a process for ensuring capacity to analyze at the Principal State Lab or commercial labs all NPDWR parameters that are required to be sampled in the State.</p> <p>In order to maintain primacy, the States must comply with 40 CFR 142.10, which includes the following provisions: 142.10(b)(3)(i) and 142.10(b)(4).</p> <p>See also the federal expectations file: Quickr link to Ohio FY2014 ARDP</p>
Region 5 Assistance	<p>During December 2013, Region 5 conducted an audit of the Ohio EPA principle state lab. Findings and certification decisions are available via the Quickr site (see relevant attachments below).</p> <p>The Ohio Department of Health laboratory stopped its radiochemistry analysis of drinking water samples on December 31, 2010, because of the expense in replacing aging analytical equipment, and the state has designated the Wisconsin State Lab of Hygiene, Underwriters Laboratories Inc., and Summit Environmental Technologies Inc. as acceptable laboratories for radiochemistry analysis. Ohio EPA uses the State of New York as a third-party assessor for asbestos and <i>Cryptosporidium</i> for one lab, as well as Region 5 for dioxin. According to the 2014 annual Region 5 laboratory certification program assessment, Ohio is currently certifying out-of-state labs that have National Environmental Laboratory Accreditation Conference (NELAC) certification for <i>Cryptosporidium</i>.</p>
Discrepancies	None.
Milestones	None.
Self-Assessment and Evaluation	<p>The Ohio EPA certification program is managed by their state lab.</p> <p>According to the 2014 annual Region 5 laboratory certification program assessment, Ohio doesn't anticipate any laboratory capacity issues for any of the regulated drinking water contaminants or any resource issues.</p>

FY2014 OHIO EPA PWSS PROGRAM LABORATORY CERTIFICATION END-OF-YEAR (EOY) SUMMARY

	<p>Ohio EPA 2014 EOY: Ohio is in the process of revising the laboratory certification rules to include references to the updated microbiological and chemical manuals.</p> <p>In FFY13, Ohio began implementing a new program to improve laboratory reporting performance. Ohio began sending notices of violation (NOVs) to labs for late reporting on a quarterly basis. The first set of NOVs for lab late reporting were issued in October 2013 for reporting issues uncovered in third quarter of 2013. There were 48 labs that reported 1281 samples late that received NOVs during the first round of the program. After one year of implementing the program, 24 laboratories reporting 411 samples late during the third quarter of 2014 were issued NOVs, which amounts to a 50% drop in labs reporting late and a 68% drop in samples being reported late. Implementation of this program has resulted in a drastic drop in late reporting in FFY 2014.</p> <p>In FFY 2014, the laboratory analyzed approximately 500 samples for public water systems for cyanotoxins. Ohio EPA worked with USEPA/ORD to develop a standard operating procedure for sample handling and analysis.</p> <p>Ohio EPA plans to incorporate a newly adopted Laboratory Certification Program (LCP) database (DESLITS) to track proficiency testing (PT) sample unacceptable results more efficiently.</p>
Relevant Attachments	<p><u>Quickr link to R5 certification letter and audit report</u> (April 1, 2014)</p> <p><u>Quickr link to laboratory certification program annual questionnaire</u> (2013 and 2014)</p> <p><u>Quickr link to memo from the R5 Water Division to EPA's Office of Ground Water and Drinking Water re. SOC monitoring trigger levels</u> (November 2010)</p> <p>Ohio EPA's certified laboratories website: <u>http://epa.ohio.gov/ddagw/labcert.aspx</u></p>

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FY2014 Ohio EPA PWSS Program Enforcement and Compliance Assistance EOY Summary October 1, 2013 through September 30, 2014 Federal funding used: PWSS grant, DWSRF PWSS set-aside	
State Contact	Name: Holly Kaloz Email: holly.kaloz@epa.ohio.gov Telephone Number: (614) 644-2760
EPA Region 5 Contact	Name: Dorothy Wormbly Email: wormbly.dorothy@epa.gov Telephone Number: (312) 886-9736
Expectations	<p>Evaluate compliance with all rules, and respond to violations by providing compliance assistance or enforcement as appropriate. Keep adequate records of pertinent state decisions. R5 continues to look to states to refer noncompliant PWS.</p> <p>See also the federal expectations file: Quickr link to Ohio FY2014 ARDP</p>
Region 5 Assistance	<p>Each quarter, send Ohio EPA the latest Enforcement Targeting Tool (ETT) data along with a request for referrals and updates on priority systems. R5 integrates these updates into reports before the next request is sent out.</p> <p>Assist with referrals, enhanced data exchange, analysis, data clean-up, or other joint efforts as requested by Ohio EPA.</p> <p>Track state commitments under measure SDWA02 and update Ohio EPA quarterly, engaging in discussion with states on progress as needed.</p> <p>See also the link to the federal expectations file above.</p>
Discrepancies	<p>Yes, acknowledged (i.e., sanitary surveys, PN, and CCR). See the Quickr link to Ohio PWSS program disinvestments. Region 5 tracks progress related to state and EPA efforts to obtain additional resources necessary to enable Ohio EPA to engage in resolving program discrepancies and temporary disinvestments.</p>
Milestones	<p>Each quarter, Ohio EPA updates SDWIS/FED with state enforcement data.</p> <p>Annually, by July 1, prepare and submit an ACR. Ohio EPA submitted its Calendar Year 2013 ACR to U.S. EPA on June 17, 2014.</p> <p>In 2014, R5 conducted an EV audit in OH.</p> <p>Ohio's 2014 ETT commitment was to address or resolve 42 systems. As of July 2014, Ohio addressed 79 systems (33 from the original 42 on the fixed base list plus an additional 46 that were more recently >=11). Ohio is commended for this accomplishment. Ohio's 2015 commitment is to address or resolve systems.</p> <p>Ohio EPA uses the ETT list to address systems with a score equal to or greater than 11 and is moving to address systems before reaching a score of 11. Ohio EPA is developing an annual compliance review in FFY 2015.</p>

	<p>Beginning January 1, 2014, PWSs that fail to monitor for total coliform and nitrate will receive a penalty of \$150 or more for each monitoring violation.</p> <p>See also the above link to the federal expectations file.</p>
Self-Assessment and Evaluation	<p>As of July 2014, the LMRT indicator O6(1)—the number and percent of all violations responded to per year—shows that 78 percent of all violations (8,161) that occurred in the five-year period 2009-2013 were reported “returned-to-compliance.” As of 2013, there were 93 violations at 40 systems with violation years from 2009 to 2012 with no response reported. Only 1 of these violations was health-based, the others were M/R or “other” violations.</p> <p>As of July 2014, the LMRT indicator O6(2)—the estimated median time (in days) between the proxy violation awareness date and violation response—indicates that between 2009 and 2013, Ohio reported a first response to 90 percent of all violations within 60 days or less of the proxy violation awareness date, which is an increase from 87 percent compared to the previous (2008 to 2012) data. Between 2009 and 2013, Ohio reported a first response to 90 percent (146 violations) of the PN tier 1 violations within 30 days or less of the proxy violation awareness date—an increase of 3 percentage points compared to the previous (2008 to 2012) data. Ohio reported a first response to 69 percent (112 violations) of the PN tier 1 violations within 1 week, which is an increase of 4 percentage points compared to the previous (2008 to 2012) data. The first response to three acute TCR MCL violations took longer than two months. The other tier 1 violations that took longer than two months were turbidity treatment technique violations.</p> <p>As of July 2014, the LMRT indicator O6(2b)—the time (in days) between the proxy violation awareness date to the return-to-compliance (RTC) date—indicates that the majority of all violations that occurred between 2009 and 2013—84 percent (6,851 violations)—were RTC’d within one year. The majority of tier 1 violations that occurred between 2009 and 2013—93 percent (136 violations)—were RTC’d within one year, which is a significant increase from 84 percent from the previous (2008 to 2012) data. Of the tier 1 violations that took longer than one year to RTC, three were acute TCR MCL violations, and seven were monthly turbidity exceedances.</p> <p>Ohio uses the ability to condition a license to operate in addition to traditional enforcement actions, such as bilateral compliance agreements and findings and orders. In FFY 2013, Ohio developed a process to send warning letters and Streamlined Orders with a penalty up to \$150 for each major violation for PWSs with type 23 or 25 microbiological violations and nitrate monitoring violations, beginning January 1, 2014. Outreach conducted in FFY13 resulted in increased compliance rates. In FFY14, 96 warning letters and 2 Streamlined Orders were issued. For the first time, according to Ohio’s data, Ohio has met shared goal 7 (less than 10 percent of TNCWSs with significant/major monitoring violations) in FFY 2014. Ohio calculates that 7.89% of TNCWSs had significant/major monitoring violations. . R5 will be calculating the CY 2014 shared goal results in April 2015 with SDWIS/Fed data.</p>

	<p>In 2013, DDAGW also began implementing a new compliance program for systems without operators. If a PWS fails to address notices of violation, DDAGW proposes Streamlined Orders, which requires the system to hire an appropriately certified operator and pay a \$1,000 fine.</p> <p>R5 maintains a direct enforcement role in our states and continues to pursue with Ohio EPA how to most effectively coordinate those efforts. In particular, R5 continues to look to states to refer noncompliant PWS. Ohio referred four systems to Region 5 that had not issued CCRs (with type 71 violations) on March 28, 2013. Ohio will not be referring type 72 violations, which are related to content. As of May 2014, all four of the referred CCR violations have been RTC'd.</p> <p>Ohio EPA posts lists of potential violators online, and they now have noncompliance documents since January 1, 2007, available online via their public records website through an eDocument Search. Eventually, electronic copies of most of the agency's public records will be available. EPA Region 5 commends Ohio EPA for providing easy access to these files and supporting transparency.</p> <p>EOY 2014: The administrative penalty program for total coliform and nitrate monitoring violations has increased compliance with the NCWS.</p> <p>R5 appreciated Ohio's assistance in preparing for the October 2014 on-site joint file review and enforcement verification (EV). Ohio EPA management and staff have also been extremely helpful and responsive to R5's follow-up questions as we work to analyze the data and draft the report. R5 expects to send a draft joint review report to Ohio in February.</p>
Relevant Attachments	<p>Quickr link to enforcement SOPs—This link includes Ohio EPA's final Compliance Assurance through Enforcement Program SOP, DDAGW's Enforcement SOP, as well as EPA's June 2012 comments on the draft version of the compliance assurance through enforcement program SOP (see Addendum B for the drinking water-specific guidance). (Ohio provided more recent, draft-in-progress versions of these documents in preparation for the joint file review/EV.)</p> <p>Quickr link to Ohio EPA's Annual Compliance Reports (2010, 2011, 2012, and 2013)</p> <p>Quickr link to program review for Ohio EPA DDAGW—final report (December 2008)</p>

FINAL—MARCH 17, 2015

FY2014 Ohio EPA PWSS Program Data Management and Reporting EOY Summary October 1, 2013 through September 30, 2014 Federal funding used: PWSS grant		
State Contact	Name: Tab Brewster Email: tab.brewster@epa.ohio.gov Telephone Number: (614) 644-2764	
EPA Region 5 Contact	Name: Kris Werbach (SDWIS/Fed reporting) Email: werbach.kristine@epa.gov Telephone Number: (312) 886-6527	Name: Andrea Porter (high priority queries) Email: porter.andrea@epa.gov Telephone Number: (312) 886-4427
	Name: Wendy Drake (file reviews) Email: drake.wendy@epa.gov Telephone Number: (312) 886-6705	Name: Email: Telephone Number:
Expectations	<p>Ohio will maintain a database that tracks public water systems inventory, actions, and violations for all federal rules. Ohio will update to the most recent version of FedRep as new releases are made, conduct timely reporting on a quarterly basis to Region 5 (FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15), and correct any reporting errors as soon as possible. States must report to EPA actions and sample data quarterly and inventory data at least annually in accordance with 40 CFR 142.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA.</p> <p>See the expectations file for additional information: Quickr link to Ohio FY2014 ARDP</p>	
Region 5 Assistance	<p>Tab Brewster (Ohio EPA) is on the workgroup for SDWIS Prime interfacing applications.</p> <p>R5 expects that compliance determination and violation reporting training (CDVRT) will be conducted when all of the CDVRT modules are completed. The completion of the modules has been delayed; R5 anticipates releasing the CDVRT in the future.</p> <p>Region 5 will assist states with resolving data quality issues, as appropriate.</p> <p>R5 will notify states of any inventory requirement changes when they are documented by EPA headquarters.</p> <p>See also the federal expectations file attached above.</p>	
Discrepancies	<p>Yes, there are acknowledged discrepancies. See Quickr link to Ohio PWSS program disinvestments for more information. Region 5 tracks progress related to state and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments.</p>	
Milestones	<p>R5 requests that states copy the region when responding to the annual headquarters survey asking about which states are using various SDWIS/State components.</p> <p>Ohio EPA is using SDWIS/State 3.2 and FedRep 3.4 to report to SDWIS/Fed ODS. Ohio is commended for being up-to-date on SDWIS/State software upgrades. Ohio is currently working on an SOP to ensure consistent reporting of GWR violations.</p>	

	<p>Ohio EPA 2014 EOY: Ohio EPA is preparing to replace the SDWIS/State Electronic Sanitary Survey (ESS) application with the GEC Safe Water Information Field Tool (SWIFT) product to capture sanitary survey inspections.</p> <p>SOPS are drafted or being drafted for some SDWIS components, such as Chem/Rad, TCR, GWR and some of Lead and Copper related to SOX'ing and RTC'ing violations and significant deficiencies. The TCR SOP is complete, but will need to be updated after the rule changes are made. The Chem/Rad SOP is under revision to incorporate Stage 2. The GWR SOP is undergoing final editorial revisions. The Lead and Copper SOP should be completed in SFY 2014. DDAGW worked on the SOP for significant deficiencies through FFY 2013. The Rescind/RTC SOP is under development, which should improve SDWIS data quality and consistency</p> <p>Ohio EPA applied for and received the National Environmental Information Exchange Network (NEIEN) 2013 grant to make Drinking Water Watch (DWW) available to external customers. Ohio will be making DWW public once SDWIS Prime is completed and web services are available for DWW to consume the data. Also included in the NEIEN grant was the installation of Windsor Solutions' Site Profiler web application. Site Profiler will also publish SDWIS data out to the web along with other environmental program data in a GIS interface. Included in this will be links to Ohio's electronic document management system, allowing the public to retrieve and view non-compliance and other regulatory documents.</p> <p>Ohio is phasing in a requirement that PWSs will need to use new reporting applications to submit their monthly operating reports. This requirement is being phased in based on system population, with the largest systems required to begin by July 1, 2012, and the smallest systems by July 1, 2014. Ohio EPA worked with systems to get all systems to report their MORs electronically.</p> <p>See also federal expectations file above.</p>
Self-Assessment and Evaluation	<p>Ohio continues to meet the quarterly deadlines for reporting data to the national database, SDWIS/Fed-ODS, and is making corrections to identified data quality errors in a timely manner. Ohio is commended for their commitment to improving data quality in the national data system by consistently correcting the errors identified on the national database error reports.</p> <p>As of October 2014, the CY2012 to CY2013 TCR late reporting query indicates that 99.8% of TCR violations were reported on time in 2012 (2012 total: 1,037), and 99.5% of TCR violations were reported on time in 2013 (2013 total: 885). Ohio is commended for this achievement.</p> <p>As of October 2014, the CY2012 to CY2013 nitrate late reporting query indicates that 83.1% of nitrate violations were reported on time in 2012 and 16.9% were reported one quarter late (2012 total: 77). In 2012, 82% of nitrate violations were reported on time, and 18% were reported one quarter late (2013 total: 89).</p>

	<p>The state adopted laboratory certification rules in September 2009 requiring labs to electronically report data to the state using an electronic Drinking Water Reports (eDWR) system (effective July 2010).</p> <p>Ohio EPA posts lists of potential violators, and the state now has noncompliance documents since January 1, 2007, available online via their public records website through an eDocument Search. Eventually, electronic copies of most of the agency's public records will be available.</p> <p>U.S. EPA appreciates the important contributions from Rick Magni and Tab Brewster on the SDWIS Prime workgroups.</p> <p>R5 appreciated Ohio's assistance in preparing for the October 2014 on-site joint file review and enforcement verification (EV). Ohio EPA management and staff have also been extremely helpful and responsive to R5's follow-up questions as we work to analyze the data and draft the report. R5 expects to send a draft joint review report to Ohio in February.</p>
Relevant Attachments	<p>Quickr link to program review for Ohio EPA DDAGW—final report (December 2008)</p> <p>Quickr link to Ohio's FY14 measures and indicators summary</p>

FY2014 OHIO EPA PWSS PROGRAM CAPACITY DEVELOPMENT END-OF-YEAR (EOY) SUMMARY

FINAL—MARCH 17, 2015

FY2014 Ohio EPA PWSS Program Capacity Development EOY Summary October 1, 2013 through September 30, 2014 Federal funding used: PWSS grant, small systems technical assistance, PWSS, and administration and technical assistance set-asides	
State Contact	Susan Schell susan.schell@epa.ohio.gov (614) 752-9725
EPA Region 5 Contact	Sahba Rouhani rouhani.sahba@epa.gov (312) 886-0245
Expectations	<p>Ohio EPA ensures that new and existing CWSs/NTNCWSs can demonstrate technical, managerial, and financial capacity to operate in compliance with federal and state regulations.</p> <p>Ohio EPA provides a report to R5 annually, by September 30th each year, showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. The report should address the new capacity development reporting measures.</p> <p>Every three years, submit a report to the governor and provide a copy to R5 on the efficacy of the strategy and the progress made toward improving the capacity of water systems in Ohio. The next report to the governor is due October 1, 2017.</p> <p>See also the federal expectations file: Quickr link to Ohio FY2014 ARDP</p>
Region 5 Assistance	<p>R5 will send a reminder to Ohio EPA about the capacity development annual report in August, annually.</p> <p>R5 sent a reminder to Ohio about the report to the governor in August 2014.</p> <p>R5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with Ohio, to promote SWI activities including those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other PWSS program activities, including source water protection, DWSRF, operator certification, and all-hazards resilience approaches.</p> <p>See also the link to the federal expectations file above.</p>
Discrepancies	None.
Milestones	<p>Annually provide documentation to R5 showing the ongoing implementation of both the new systems program and the existing systems strategy. Due dates: September 30, 2014 and September 30, 2015</p> <p>The report to the governor was due October 1, 2014. The report was submitted.</p>

Self-Assessment and Evaluation	<p>Ohio EPA 2014 EOY: Activities in program year 2013 taken by Ohio EPA to strengthen system capacity included establishing a capability assurance workgroup to improve all PWS capability. In FFY 2013, the workgroup worked on capability screening tools for systems that hit certain triggers. The screening tool will indicate areas for improvement and be used to determine if a capability assurance plan (CAP) is needed. In SPY 2014, the CAP screening tool was piloted on Water Supply Revolving Loan Account (WSRLA) loan applicants. Staff and RCAP were trained on the screening tool. The workgroup continues to work on expanding the program, potentially with legislation and rules in FFY 2015. Ohio EPA is commended for continuing to implement an effective capability assurance program and for continuing to identify new opportunities to increase system capability.</p> <p>Ohio EPA has a contract with Great Lakes Rural Community Assistance Program (RCAP) to conduct energy audits and provide training to local officials on asset management and maximizing system efficiency and sustainability with reduced resources. RCAP offered free, online training available to the public in SPY 2013 and 2014. Ohio EPA also participates in sustainable infrastructure efforts of the Ohio Water Resources Council. RCAP began an intensive technical assistance pilot project in 2012 for systems lacking technical, managerial, and financial capacity that continued in 2013 and 2014.</p> <p>The Drinking Water Assistance Fund (DWAF) program includes incentives in the SRF point structure for effective management, such as utility board training, conservation, preventative maintenance, regionalization/consolidation, backflow prevention programs, contingency plans, endorsed protection plans, asset management plans, impacts from harmful algal blooms (HABs), projects consistent with sustainable growth plans, etc. A specific targeted fund for auxiliary power was included in SPY 2014. SPY 2015 includes targeted funds to cyanotoxin grants and HAB infrastructure loans.</p> <p>Two new positions have been established, including a capability assurance position to help develop a more comprehensive strategy for providing technical, managerial, and financial assistance to public water systems (PWSs), as well as a statewide lead engineer position.</p>
Relevant Documents and Websites	<ul style="list-style-type: none"> ▪ Quickr link to Region 5 approval letters (2011, 2012, and 2013) ▪ Ohio's capability assurance strategy annual reports (2011, 2012, 2013, and 2014) ▪ Quickr link to Ohio's capability assurance strategy triennial report to the governor (September 2011 and September 2014) ▪ Quickr links to Ohio EPA's small systems technical assistance set-aside reports (2011, 2012, 2013, and 2014) and U.S. EPA DWSRF set-aside review reports (2008-2012) that document work conducted under the RCAP contract ▪ Ohio's capability assurance website: http://epa.ohio.gov/ddagw/financialassistance.aspx (see the capability assurance tab) ▪ Ohio's capability assurance program guidelines (October 1999): http://www.epa.ohio.gov/portals/28/Documents/dwaf/eng03.pdf

FY2014 OHIO EPA PWSS PROGRAM CAPACITY DEVELOPMENT END-OF-YEAR (EOY) SUMMARY

	<ul style="list-style-type: none">▪ <i>Quickr link to Ohio's capability assurance plan for new PWSs</i> (September 1999)
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FY2014 OHIO EPA PWSS PROGRAM OPERATOR CERTIFICATION END-OF-YEAR (EOY) SUMMARY

FINAL—MARCH 17, 2015

FY2014 Ohio EPA PWSS Program Operator Certification EOY Summary October 1, 2013 through September 30, 2014 Federal funding used: PWSS grant	
State Contact	Andy Barienbrock andrew.barienbrock@epa.ohio.gov (614) 728-1216
EPA Region 5 Contact	Jennifer Crooks crooks.jennifer@epa.gov (312) 886-0244
Expectations	<p>States establish and maintain minimum professional standards for the operation and maintenance of all public water systems to ensure that properly trained and certified professionals are overseeing the treatment and distribution of safe drinking water and to promote compliance.</p> <p>Provide documentation to U.S. EPA showing the ongoing implementation of the program to avoid 20% withholding of the DWSRF grant. Annual reports must include operator certification reporting measures.</p> <p>For operators of CWSs and NTNCWSs: Provide training and certification opportunities for new operators and for operators upgrading and renewing certification, including training to ensure sustainable water utilities and supplies.</p> <p>See also the federal expectations file: Quickr link to Ohio FY2014 ARDP</p>
Region 5 Assistance	R5 will provide outreach material on sustainable water utilities and supplies to operators and technical assistance providers, in coordination with the state.
Discrepancies	Ohio EPA identifies and conducts informal and formal enforcement against systems without a certified operator, but Ohio EPA is not reporting 40 CFR 141.130(c) operator certification treatment technique violations to SDWIS/Fed—that is, type 12 violations for failure to have a certified operator as required by the Stage 1 Disinfectants and Disinfection Byproducts Rule (D/DBPR). Ohio does issue violations for failure to have an operator, but they are not specifically D/DBP treatment technique violations. Ohio EPA has currently disinvested in reporting type 12 violations to SDWIS/Fed.
Milestones	None.
Self-Assessment and Evaluation	<p>EPA approved Ohio's 2014 operator certification program annual report. Ohio's implementation of the operator certification program complies with the requirements of the federal operator certification guidelines. Ohio continues to recognize the importance of properly trained and certified operators in protecting public health.</p> <p>To fulfill a need to make convenient exam options available to operators, Ohio drafted rules documenting criteria to facilitate a process by which third party exam providers would be able to request approval from the state to give exams to operators in Ohio. These rules became effective in January 1, 2013. The Association of Boards of Certification (ABC) was approved as an examination provider and began providing examinations in 5 locations across the state in federal fiscal year (FFY) 2014. Ohio EPA will still provide paper and pencil</p>

	<p>examinations two times per year in a central location.</p> <p>Ohio developed a data management system to track all certified operators and created an e-application and e-payment system for certified operators. Both systems are complete.</p> <p>Activities taken by Ohio EPA to ensure operators are appropriately certified include overseeing the certification of 5,033 drinking water operators with active certificates. During SFY 2014, 98 percent of operators were properly certified; 78 classified facilities were without an appropriately certified operator. Ohio is commended for maintaining a consistent number of certified operators, particularly in light of the conclusion of the federal Expense Reimbursement Grant in 2012.</p> <p>Ohio EPA 2014 EOY: Provided free web-based training for Class A operators. Developed an e-application and payment system, which can be used for operator exam applications, renewal applications, contact hour applications, and contact hour tracking for individual operators. DDAGW continued the compliance program for systems without operators. If a PWS fails to address notices of violation, DDAGW proposes an expedited settlement agreement, which requires the system to hire an appropriately certified operator and pay a \$1,000 fine. In FY 2013, the certified operator program expanded its examination process to allow third party providers. Examinations began in FY 2014. During FFY 2014 approximately 450 operators took advantage of the third party examinations. Ohio EPA is commended for offering more frequent certification examinations in more locations across the state. The addition of the Association of Boards of Certification as an approved exam provider gives applicants further opportunity to sit for an exam. Ohio EPA is commended for increasing its continuing education opportunities during SFY 2014.</p> <p>An operator actions workgroup to address operator violations was established as a new initiative in FFY 2014. It will include the development of an enforcement matrix, which will be used when violations are found, as well as a process for consistently identifying violations.</p> <p>Ohio EPA is commended for initiating new enforcement procedures to deal with systems without a certified operator. In 2013, Ohio EPA issued nine sets of the new streamlined orders, which resulted in 100% return to compliance. Here are four suggestions from R5 on how to improve Ohio's already solid operator certification program, the first two of which are focused on asset management:</p> <ol style="list-style-type: none"> 1. Train water operators how to maintain and monitor inventory and replacement life-cycle information for system components; 2. Teach water operators how to use system inventory and replacement life-cycle information to produce critical need projections for decision-makers; 3. Inform managers and municipal officials about the benefits and incentives to hire returning veterans; and 4. Train operators how to conduct Level 1 assessments to satisfy Revised
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FY2014 OHIO EPA PWSS PROGRAM OPERATOR CERTIFICATION END-OF-YEAR (EOY) SUMMARY

	Total Coliform Rule requirements.
Relevant Documents and Websites	<p><i>Quickr link to Ohio's operator certification annual report and ERG reports</i> (2011, 2012, 2013, and 2014)</p> <p><i>Quickr link to the Region 5 approval letters</i> (2011, 2012, 2013, and 2014)</p> <p>Ohio EPA certified operators website: http://www.epa.ohio.gov/ddagw/opcert.aspx</p>

FY2014 OHIO EPA PWSS PROGRAM SOURCE WATER PROTECTION END-OF-YEAR (EOY) SUMMARY

FINAL—MARCH 17, 2015

FY2014 Ohio EPA PWSS Program Source Water Protection EOY Summary October 1, 2013 through September 30, 2014 Federal funding used: DWSRF PWSS set-aside, CWA Section 106, and state drinking water fee		
State Contacts	Jeff Patzke jeffrey.patzke@epa.ohio.gov (614) 644-3029	Barb Lubberger barbara.lubberger@epa.ohio.gov (614) 644-2863
EPA Region 5 Contacts	William Spaulding spaulding.william@epa.gov (312) 886-9262	Cary McElhinney mcelhinney.cary@epa.gov (312) 886-4313
Expectations	<p>Report the number of CWSs with source water protection (SWP) plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible) as of June 30 by August 15.</p> <p>SDW-SP4a: By FY2014, Ohio’s target is to minimize risk to public health through source water protection for 43 percent of CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy).</p> <p>SDW-SP4b: By FY2014, Ohio’s target is to minimize risk to public health through source water protection for 65 percent of the population served by CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy).</p> <p>Annually report on SWP activities conducted with Drinking Water State Revolving Fund (DWSRF) set-aside funding.</p> <p>Update source water assessments, as resources allow, and complete source water assessment reports for new public water systems.</p> <p>The annual meeting was held in Chicago on April 8-10, 2014.</p> <p>See also the federal expectations file: Quickr link to Ohio FY2014 ARDP</p>	
Program successes and challenges	<p>SUCCESSES: Ohio EPA developed a methodology for estimating substantial implementation of municipal systems from an online report, provided in questionnaire format, of more than 500 moderate to high susceptibility CWSs. Ohio EPA DDAGW also assists Ohio EPA’s Division of Surface Water in assessing surface waters designated as a public water supply beneficial use. For example, Ohio’s 2014 integrated water quality report included cyanotoxin data from 2008 to 2012 as one of the drinking water beneficial use impairment indicators for Lake Erie intakes and all other public water systems with river/lake intakes. Ohio uses CWA Section 106 funds to support an ambient ground water monitoring network, among other projects (for example, see article in Region 5’s November 2012 water quality monitoring newsletter—Quickr link, pages 4-5). See also the “self-assessment and evaluation” section below for more program successes.</p> <p>CHALLENGES: Ohio’s SWP program is voluntary, with the exception that municipal public water systems serving 250 or more people are required to complete or update a source water protection plan within two years after Ohio EPA approves</p>	

FY2014 OHIO EPA PWSS PROGRAM SOURCE WATER PROTECTION END-OF-YEAR (EOY) SUMMARY

	<p>new well construction. Several issues that Ohio EPA is working to address include contamination to wells from salt storage facilities in wellhead protection (WHP) areas (Ohio developed salt storage guidance in state program year (SPY) 2012; see draft available from the Ohio Water Resources Council website), as well as potential contamination from toxic algae blooms (see Ohio's HAB website for more information), geothermal wells, hydraulic fracturing activities, and above-ground storage tanks.</p>
Region 5 Assistance	<p>Encourage data sharing with other programs to prioritize permitting and compliance activities in source water areas, for example.</p> <p>Review state 303(d) and 305(b) reports (or integrated reports) to recommend opportunities for source water protection; continue to work with the Clean Water Act program to encourage the assessment of waters for drinking water use. In FY2014, R5 provided comments on Ohio's 2014 integrated report and state nonpoint source management plan.</p> <p>R5 continues to solicit proposals from states for SWP workshops.</p> <p>EPA continues to occasionally provide SWP brochures and webinars.</p> <p>See also the link to the federal expectations file above.</p>
Self-Assessment and Evaluation	<p>Ohio EPA reported SWP substantial implementation information surpassed both of the FY14 commitments for the two SWP measures (SP4a and SP4b). Specifically, Ohio minimized risk to public health through SWP for 50% of CWSs (2014 target: 43%) and 66% of the population served by CWSs (2014 target: 65%), where "minimized risk" is achieved by substantial implementation, as determined by the state, of actions in a SWP strategy. In October 2014, Ohio reported that the next quarterly update of SDWIS will include this information as Source Water Protection Implementation milestones.</p> <p>As of October 2014, there are a total of 621 substantially implementing CWSs, which includes CWSs that purchase water from systems that are substantially implementing protective strategies.</p> <p>In SPY 2014, Ohio completed 145 source water assessment reports and endorsed 14 of the 22 SWP plans developed by municipal PWSs that were received during SPY 2014. Ohio received and accepted checklist-style protection plans from 62 non-municipal systems in SPY 2014. In addition, Ohio is commended for reviewing and providing comments on district office workplans documenting SWP implementation; coordinating with the Farm Service Agency and the Ohio Rural Water Association in the development of local source water protection plans; revising previous SWP area delineations; conducting SWP planning workshops for multiple municipalities; conducting analyses, site inspections, and investigations of salt storage facilities; and coordinating with ODNR and reviewing planned routes for new oil and gas pipelines and sharing findings with PWSs with SWP areas within or next to the proposed routes.</p> <p>EPA appreciated Mike Eggert's assistance in preparing for and participating in the drinking water designated use webinar for Region 5 states held in September and the workshop for Wisconsin held in October. His knowledge and expertise was</p>

FY2014 OHIO EPA PWSS PROGRAM SOURCE WATER PROTECTION END-OF-YEAR (EOY) SUMMARY

	<p>invaluable in the success of these two efforts.</p> <p>EPA also appreciated Ohio's comments on the CWA/SDWA toolkit, which were submitted through ASDWA.</p>
Relevant Attachments	<ul style="list-style-type: none"> ▪ <i>Quickr links to Ohio EPA's WHP and PWSS set-aside reports and U.S. EPA DWSRF set-aside review reports.</i> ▪ <i>Quickr link to Ohio's criteria for substantial implementation (2014)</i> ▪ <i>Quickr link to CWA Section 106 (ground water section) grant reports (2011, 2012, and 2013)</i> ▪ <i>Quickr link to Ohio EPA SWP program fact sheet in the draft national SWP report (January 2012)</i> ▪ Click here for Ohio's drinking water source protection newsletter updates (2011, 2012, and 2013) ▪ Click here for Ohio's source water assessment and protection program website. ▪ Click here for Ohio's ground water quality characterization program website.

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

FINAL—MARCH 17, 2015

FY2014 Ohio EPA PWSS Program Measures and Indicators End-of-Year Summary

October 1, 2013 through September 30, 2014

Ohio EPA contact: Beth Messer, beth.messer@epa.state.oh.us, (614) 644-2752

Region 5 contacts: Wendy Drake, drake.wendy@epa.gov, (312) 886-6705; and Andrea Porter, porter.andrea@epa.gov, (312) 886-4427

NOTE: An asterisk () indicates that a target was not met.*

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
Office of Water National Program Measures								
1	% of pop. served by CWS that receive DW that meet health based standards	NPM/GPRA	PWSS overall	SDW-2.1.1 (Updated quarterly by HQ—NPM Measures Tables filtered for active, non-RTC'd MCL violations)	Quickr: National Program Manager (NPM) measures	FY11: 82% FY12: 95% FY13: 94% FY14: 94% FY15: 92%	FY ¹ (e.g., for FY15, the measure is calculated as of October 2015 for the period 7/1/14 to 6/30/15)	FY11 EOY: 96.9% (NOTE: Ohio had two large systems (Cleveland and Dayton) with new violations); FY11 4 th quarter: 96.6% FY12 EOY: 97.8% FY13 EOY: 98.4% FY14 EOY: 93.1%* FY15 EOY:
2	% of CWS that meet health based standards	NPM/GPRA	PWSS overall	SDW-SP1.N11 (Updated quarterly by HQ—NPM Measures Tables)	Quickr: NPM measures	FY11: 91% FY12: 94% FY13: 93% FY14: 93% FY15: 90%	same as item #1 above	FY11 EOY: 94.5%; FY11 4 th quarter: 94.6% FY12 EOY: 96.1% FY13 EOY: 96.4% FY14 EOY: 94.2% FY15 EOY:
3	% of “person months” in which CWS are meeting health-based standards	NPM/GPRA	PWSS overall	SDW-SP2 (Updated quarterly by HQ—NPM Measures Tables)	Quickr: NPM measures	FY11: 91% FY12: 96% FY13: 96% FY14: 96% FY15: 95%	same as item #1 above	FY11 EOY: 98.8%; FY 11 4 th quarter: 99.2% FY12 EOY: 99.1% FY13 EOY: 99.4% FY14 EOY: 97.5% FY15 EOY:
4	% of CWS with minimized risk b/c of SWP	NPM/GPRA	PWSS GW SWP	SDW-SP4a (Updated annually in October by States)	Quickr: NPM measures	FY11: 41% FY12: 43% FY13: 43% FY14: 43% FY15: 45%	same as item #1 above	FY11 EOY: 43.3% FY12 EOY: 45% FY13 EOY: 45% FY14 EOY: 50% FY15 EOY:

¹ However, due to the lag between when data are submitted and when the FY ends, the actual date range of the data used for these measures is one quarter off from the FY.

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
5	% of population served by CWSs with minimized risk b/c of SWP	NPM/GPRA	PWSS GW SWP	SDW-SP4b (Updated annually in October by States)	Quickr: NPM measures	FY11: 62% FY12: 65% FY13: 64% FY14: 65% FY15: 64%	same as item #1 above	FY11 EOY: 63.4% FY12 EOY: 73.8% FY13 EOY: 64% FY14 EOY: 66% FY15 EOY:
6	% of CWS with san. survey w/in the past 3 yrs	NPM/GPRA	PWSS SS	SDW-01a (Updated annually in July by HQ – Status queries updated by Region 5 in April and October) NOTE: This national measure was modified in FY14 to include ground water systems in addition to the surface water systems previously tracked.	Quickr: NPM measures	FY11: 97% FY12: 95% FY13: 92% FY14: 75% (See NOTE in “name and update schedule” column.) FY15: 79%	CY (e.g., July 2014 data includes sanitary surveys at CWSs completed between 1/1/1 and 12/31/13; R5 also looks at NCWSs completed between 1/1/09 and 12/31/13, but this is not part of the national measure)	FY11 EOY: As of July 2011, 96.3%* (282 out of 293) of the sanitary surveys at surface water CWSs were completed between CY2008 and CY2010. FY12 EOY: As of July 2012, 98.9% (269 out of 272) of the sanitary surveys at surface water CWSs were completed between CY2009 and CY2011. FY13 EOY: As of July 2013, 98.9% (269 out of 272) of the sanitary surveys at surface water CWSs were completed between CY2010 and CY2012. FY14 EOY: 99.6% (1,204 out of 1,209) FY15 EOY:
7	Fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the DWSRF	NPM/GPRA	DWSRF	SDW-04 (Updated annually as of June 30 by HQ and tracked through DWNIMS database)	Quickr: NPM measures	FY11: 70% fund utilization rate for both ARRA and base funds, as well as for base only funds FY12: 95% for ARRA and base	The FY14 EOY data are cumulative as of 6/30/14.	FY11 EOY: Ohio's fund utilization rate through 6/30/11 for the DWSRF was 91% for ARRA- and base-funded projects and 90% for base-funded projects only. Ohio surpassed the target. FY12 EOY: Ohio's fund utilization rate through 6/30/12 for the DWSRF was 86% for ARRA- and 85% for base-funded projects.* FY13 EOY: 89.6%* NOTE: Region 5's State and Tribal Programs Branch (STPB) uses tools and resources other than national

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
						FY13: same as FY12 FY14: 90% FY15: no state-specific targets		measures SDW-04, SDW-05, and SDW-11 to provide an accurate evaluation of the state's progress in implementing the DWSRF program. Region 5 believes that the most recent DWSRF Performance Evaluation Report (PER), prepared by STPB with input from GWDWB, should be consulted for a more accurate status of the state's DWSRF program.
8	# of DWSRF projects that have initiated operations	NPM/GPRA	DWSRF	SDW-05 (Updated annually as of June 30 by HQ and tracked through DWNIMS database)	Quickr: NPM measures	FY11: 270 ARRA- and base-funded projects and 230 base-funded only projects FY12: 300 for ARRA and base FY13: 330 with ARRA and 280 base FY14: 410 FY15: no state-specific targets	The FY14 EOY data are cumulative as of 6/30/14.	FY11 EOY: Through 6/30/11, 285 ARRA- and base-funded DWSRF projects had initiated operations, and 237 base-funded projects had initiated operations. Ohio surpassed the target. FY12 EOY: Through 6/30/12, 329 ARRA- and base-funded DWSRF projects had initiated operations. Ohio surpassed the target. FY13 EOY: 383
9	% of DWSRF projects awarded to small PWSs serving <500, 501-3,300, & 3,301-10,000 consumers	NPM/GPRA	DWSRF	SDW-11 (Updated annually as of June 30 by HQ)	Quickr: NPM measures	This is an indicator—there are	The FY14 EOY data are cumulative as of 6/30/14.	FY11 EOY: Through 6/30/11, 64% (cumulative) of total DWSRF assistance agreements were with PWSs serving less than 10,001 people.

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
						no state targets.		FY12 EOY: 66% (through 6/30/12) FY13 EOY: 63% (through 6/30/13)
10	# & % of small CWS and NTNCWS (<500, 501-3,300, & 3,301-10,000) w repeat health-based NO ₃ & NO ₂ , Stage 1 D/DBP, SWTR, & TCR violations	NPM/GPRA	PWSS	SDW-15 (Updated annually in October by HQ)	Quickr: NPM measures	This is an indicator; there are no state targets.	same as item #1 above	FY11 EOY: 2% (39 out of 1,874) FY12 EOY: 1.5% (28 out of 1,838) FY13 EOY: 1.6% (29 out of 1,806) FY14 EOY: 1.7% (31 out of 1,778) FY15 EOY:
11	# & % of schools and childcare centers that meet all health-based DW standards	NPM/GPRA	PWSS	SDW-17 (Updated annually in October by HQ, but can be generated from quarterly NPM measure)	Quickr: NPM measures	This is an indicator; there are no state targets.	same as item #1 above	FY11 EOY: 91% (304 out of 333) FY12 EOY: 94.7% (301 out of 318) FY13 EOY: 93.8% (285 out of 304) FY14 EOY: 93.2% (275 out of 295) FY15 EOY:
12	# of dw and ww utilities and local, state, and fed officials receiving training and tech assistance to enhance emergency prep and resiliency to reduce risk from all hazards, including those attributed to climate change	NPM/GPRA	PWSS	SDW-21 (Updated annually in October by HQ)	TBD	This is an indicator; there are no state targets.	TBD	FY15 EOY:
Office of Enforcement and Compliance Assistance National Program Measure								
13	During FY2014, the primacy agency must address with a formal enf action or RTC the # of priority systems equal to the # of its PWSs that have a score of 11 or higher on the July 2011 ETT report	NPM/OECA	PWSS ECA	SDWA02 (Updated quarterly by HQ at http://www.epa-otis.gov/otis/sdwa_home.html)	ETT websites: ETT (OECA's OTIS drinking water data website)	FY11: Ohio committed to addressing or resolving 152	The ETT is generated on a quarterly basis with the measure based on FY ² .	Ohio's 2014 commitment is to address or resolve 42 systems. As of July 2014, Ohio addressed 79 systems (33 from the original 42 on the July 2013 fixed base list plus an additional 46 that had become priority systems after July 2013). Ohio is commended for this accomplishment.

² Each quarterly ETT calculation includes the most current data in the associated SDWIS/FED data freeze. For example, the October 2012 ETT includes data through 6/30/2012. The ETT retrieves addressed violations going back 5 years from the most current data (i.e., for October 2012, the ETT retrieves addressed violations from 7/1/2007 to 6/30/2012). Note that addressed violations do not contribute to ETT scores. In addition, the ETT score includes all un-addressed violations, even if they are more than 5 years old.

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
					ETT (R5 PWSS programs Quickr website)	systems. FY12: 122 FY13: 78 FY14: 42 FY15: 47		
Regional Shared Goals								
14	1. % of <u>NTNCWSs</u> meeting all health-based standards 2. % of <u>TNCWSs</u> meeting all health-based standards 3. % of <u>population</u> served by CWSs with <u>significant/major monitoring violations</u> (includes LCR Type 66 violations) 4. % of <u>CWSs</u> with <u>significant/major monitoring violations</u> (includes LCR Type 66 violations) 5. % of <u>NTNCWSs</u> with significant/major monitoring violations for <u>acute</u> health risks 6. % of <u>NTNCWSs</u> with significant/major monitoring violations for <u>chronic</u> health risks (LCR Type 66 violations are not included, not considered chronic) 7. % of <u>TNCWSs</u> with significant/major monitoring violations	Shared Goals		(Updated annually in April by Region 5; the milestones were revised in CY12)	Quickr: Regional shared goals	By CY2016: 1 = ≥95% 2 = ≥95% 3 = <5% 4 = <10% 5 = <5% 6 = <10% 7 = <10%	CY	For CY2012: 1 = 93.0%* 2 = 92.7%* 3 = 16.2%* (15.1% without Type 66) 4 = 16.0%* (10.6% without Type 66) 5 = 7.8%* 6 = 6.7% 7 = 19.6%* For CY2013: 1 = 91.8%* 2 = 92.1%* 3 = 19.3%* (18.4% without Type 66) 4 = 20.3%* (17.4% without Type 66) 5 = 4.2% 6 = 8.6% 7 = 13.6%*

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
Regional Program Oversight Measures								
15	# & % Violations/Yr	Logic Model Reporting Tool (LMRT)		A6(1) (Updated annually in July by HQ)	Quickr: LMRT	None.	CY—the LRMT captures 5 calendar years of data (e.g., the July 2012 dataset includes data from January 2007 to December 2011) ³	See below.
<p>ACTIVE SYSTEMS ONLY:</p> <p>July 2013: A6(1) continues to show generally stable numbers of PN tier 1, 2, and 3 violations between 2008 and 2012. There continue to be relatively low numbers of tier 1 violations, ranging from 21 in 2009 to 51 in 2011.</p> <p>July 2014: There were Tier 34 systems with 34 Tier 1 violations in 2013, which is a slight increase from 2012 when there were 30 Tier 1 violations. The total number of violations was 2,192 in 2013, which is higher than in previous years (2009-2012). The number of arsenic, nitrate, and TCR violations have decreased, and the number of GWR, LCR, other IOC, and Stage 1 DBP violations have increased since 2009. The majority of the violations are for TN systems serving less than or equal to 500 people.</p>								
16	Cumulative # & % <u>All Violations</u> Responded to/Yr	LMRT		O6(1) (Updated annually in July by HQ)	Quickr: LMRT	None.	CY—see explanation above	See below.
<p><i>Note:</i> In July 2014, the data for O6(1), O6(1b), and O6(1c) were combined into one pivot table, O6(1), which includes all violations, not only the chem/rad/DBP violations.</p> <p>ACTIVE SYSTEMS ONLY:</p> <p>July 2013: As of 2012, there were 80 non-health-based (M/R) chem/rad/DBP violations with violation years from 2008 to 2011 with no response reported, the majority of which occurred at small and very small systems. However, six of these 80 violations have been RTC'd based on data provided by Ohio EPA on July 26, 2013, and nine of these violations are for unregulated contaminants, which may be errors. Sixty-five of these 80 violations indicate no action taken by Ohio EPA as of July 26, 2013.</p>								

³ The LMRT is violation-based and pulls violations for 5 years from SDWIS/FED and assigns each violation a year in which it occurred, based on the various dates reported to us generally as compliance period begin dates. For 2007-2011, all violations that occurred in one of those years would be included. Long-term, open-ended violations that occurred before 2007 would not be included, even if they were still open at that time. A violation that occurs during the 5-year period is included in the LMRT, regardless of its enforcement status.

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
	July 2014: Seventy-eight percent of all violations (8,161) that occurred in the five-year period 2009-2013 were reported “returned-to-compliance.” As of 2013, there were 93 violations at 40 systems with violation years from 2009 to 2012 with no response reported. Only 1 of these violations was health-based (TCR MCL at Kyber Run Golf Course), the others were M/R or “other” violations.							
17	Cumulative # & % <u>TCR/SWTR/FBRR Violations</u> Responded to/Yr	LMRT		O6(1b) (Updated annually in July by HQ)	Quickr: LMRT	None.	CY—see explanation above	See below.
	ACTIVE SYSTEMS ONLY: July 2013: As of 2012, there were 7 TCR MCL and 1 TCR M/R violations with violation years from 2007 to 2008 with no response reported, all of which occurred at very small systems. These violations do not appear in the data provided by Ohio EPA on July 26, 2013, because these violations occurred before April 1, 2009. July 2014: See O6(1).							
18	Cumulative # & % <u>“Other” Violations</u> Responded to/Yr	LMRT		O6(1c) (Updated annually in July by HQ)	Quickr: LMRT	None.	CY—see explanation above	
	ACTIVE SYSTEMS ONLY: July 2013: There continue to be a relatively small number of 2008 to 2012 “other” (CCR and PN) violations for which no response was reported as of 2012. Specifically, as of 2012, there were 10 CCR violations from 2008, 7 CCR violations from 2009, 1 PN violation from 2010, 4 PN violations from 2011, and 5 (4 PN and 1 CCR) violations from 2012 with no response reported. Very small systems comprised 81 percent (22 violations) of the CCR/PN violations from 2008 to 2012 with no response reported as of 2012. July 2014: See O6(1).							
19	<u>Violation Response Rate:</u> Estimated Median Time (in days) Between Proxy Vio Awareness Date & Vio Response, over the most recent 5 yrs	LMRT		O6(2) (Updated annually in July by HQ)	Quickr: LMRT	None.	CY—see explanation above	See below.
	ACTIVE SYSTEMS ONLY: July 2013: The majority of all violation types (87 percent or 9,336 violations) continued to receive a first response reported within two months. The percentage of PN tier 1 violations addressed within 30 days has generally been increasing between 2008 and 2012, ranging from 75 percent in 2008 to 97 percent in 2009. Ohio reported a first response to 87 percent (135 violations) of the PN tier 1 violations within 30 days or less of the proxy violation awareness date and 65 percent (101) within a week between 2008 and 2012. The first response rates to tier 2 violations within 30 days continue to improve between 2008 and 2012. Ohio reported a first response to 93 percent (2,068) of the tier 2 violations within two months and 72 percent (1,594) within 1 month, the latter of which is an improvement compared to 66 percent according to the last (July 2012) dataset. Ohio reported a first response to 85 percent (7,125) of the tier 3 violations within 2 months and 57 percent (4,774) within 1 month.							

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
	<p>July 2014: Between 2009 and 2013, Ohio reported a first response to 90 percent of all violations within 60 days or less of the proxy violation awareness date, which is an increase from 87 percent compared to the previous (2008 to 2012) data.</p> <p><i>Tier 1:</i> Between 2009 and 2013, Ohio reported a first response to 90 percent (146 violations) of the PN tier 1 violations within 30 days or less of the proxy violation awareness date—an increase of 3 percentage points compared to the previous (2008 to 2012) data. Ohio reported a first response to 69 percent (112 violations) of the PN tier 1 violations within 1 week, which is an increase of 4 percentage points compared to the previous (2008 to 2012) data. The first response to three acute TCR MCL violations (Wood Acres Campground, Mount Vernon Academy, and Geneva Hills Residence) took longer than two months. The other tier 1 violations that took longer than two months were turbidity treatment technique violations.</p>							
20	<u>Violation Return to Compliance (RTC) Rate:</u> Time (in days) between proxy vio awareness date and RTC date, over the most recent 5 yrs	LMRT		O6(2b) (Updated annually in July by HQ)	Quickr: LMRT	None.	CY—see explanation above	See below.
	<p>ACTIVE SYSTEMS ONLY:</p> <p>July 2013: The majority of tier 1 violations that occurred between 2008 and 2012—84 percent (114 out of 136 violations)—were RTC’d within one year. Of these tier 1 violations, 30 percent (16 out of 54) of the LT1 TT violations and 9 percent (6 out of 66) of the TCR MCL violations took more than one year to RTC; all of the nitrate violations were RTC’d within one year. The majority of tier 2 violations—81 percent (1,418 out of 1,744) were RTC’d within one year. The majority of tier 3 violations—85 percent (5,741 out of 6,772)—were RTC’d within one year.</p> <p>July 2014: The majority of all violations that occurred between 2009 and 2013—84 percent (6,851 violations)—were RTC’d within one year.</p> <p><i>Tier 1:</i> The majority of tier 1 violations that occurred between 2009 and 2013—93 percent (136 violations)—were RTC’d within one year, which is a significant increase from 84 percent from the previous (2008 to 2012) data. Of the tier 1 violations that took longer than one year to RTC, three were acute TCR MCL violations, and seven were monthly turbidity exceedances.</p> <p><i>Tier 2:</i> The majority of tier 2 violations that occurred between 2009 and 2013—86 percent (1,338 violations) were RTC’d within one year, which is an increase from 81 percent from the previous (2008 to 2012) data.</p> <p><i>Tier 3:</i> The majority of tier 3 violations that occurred between 2009 and 2013—84 percent (5,377 violations) were RTC’d within one year, which is about the same percentage as the previous (2008 to 2012) data (85 percent).</p>							
21	# & % of Systems in Compliance with TT, MCL, and MRDL Requirements/Yr	LMRT		S5(1) (Updated annually in July by HQ)	Quickr: LMRT	None.	CY—see explanation above	
	<p>ACTIVE SYSTEMS ONLY:</p> <p>July 2013: Between 2008 and 2012, the number of systems in violation with MCL/TT/MRDL requirements ranged from 277 in 2009 to 326 in 2011. Eighty percent (1,207) of the systems with MCL/TT/MRDL violations were for TCR, 7 percent (111) were for Stage 1 DBP, 5 percent (74) were for arsenic, and 4 percent were for LCR.</p>							

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
	July 2014: Between 2009 and 2013, the number of systems in violation with MCL/TT/MRDL requirements ranged from 273 in 2012 to 317 in 2009. In 2013, the most recent year for which data are available, there were 334 systems in non-compliance with these requirements. Eighty-three percent (1,219) of the systems with MCL/TT/MRDL violations were for TCR, 7 percent (100) were for Stage 1 DBPs, 4 percent (58) were for LCR, and 3 percent (44) were for arsenic. Either one or less than one percent of systems had MCL/TT/MRDL violations for LT1 (18 systems), nitrates (14), SWTR (8), LT2 (7), Stage 2 DBP (5), GWR (2), and VOC (1).							
22	# & % of Systems in Compliance with M/R Requirements/Yr	LMRT		S5(2) (Updated annually in July by HQ)	Quickr: LMRT	None.	CY—see explanation above	
ACTIVE SYSTEMS ONLY: July 2013: Between 2008 and 2012, the number of systems in violation of M/R requirements ranged from 749 in 2011 to 908 in 2010. In the 2008 to 2012 period, 66 percent (2,674) of the systems with M/R violations were for TCR, 11 percent (444) were for LCR, 10 percent (410) were for nitrate, and 3 percent were for Stage 1 DBP and GWR (121 and 111, respectively). July 2014: Between 2009 and 2013, the number of systems in violation of M/R requirements ranged from 706 in 2011 to 866 in 2010. In 2013, the most recent year for which data are available, there were 716 systems in non-compliance with these requirements. In the 2009 to 2013 period, most (61 percent or 2,295 systems) of the systems with M/R violations were for TCR, 12 percent (463 systems) were for LCR, 9 percent (353) were for nitrate, 6 percent (230) were for Stage 1 DBP, 4 percent (156) were for GWR, 2 percent were for Stage 2 DBP and VOC (86 and 77, respectively). Either one or less than one percent of systems had M/R violations for arsenic (39 systems), SOC (13), other IOC (11), SWTR (8), rads (8), and LT1 (7).								
23	# & % of Systems in Compliance with 'Other' Requirements/Yr	LMRT		S5(4) (Updated annually in July by HQ)	Quickr: LMRT	None.	CY—see explanation above	
ACTIVE SYSTEMS ONLY: July 2013: The number of systems with “other” (mostly CCR, as well as some PN rule, GWR, and LT2) violations has been steadily increasing between 2008 and 2012 in all size types. Between 2008 and 2012, the number of systems with other violations ranged from 29 in 2009 to 105 in 2012. Ninety-one percent (247) of systems with other violations between 2008 and 2012 were for CCR, 7 percent were for PN, and the rest were for GWR and LT2 (1 percent each). July 2014: Between 2009 and 2013, the number of systems with other violations ranged from 29 in 2009 to 99 in 2012. Ninety-two percent (232) of systems with other violations between 2009 and 2013 were for CCR (most of which were small CWSs), 7 percent (17) were for PN, 1 percent (3) were for LT2, and 0.4 percent (1) were for GWR. These percentages haven’t changed much from the previous (2008-2012) data. Most of the TNCWSs with violations in this category had PN violations. Why does a NTNCWS (Ashland County Service Center) have a 2009 CCR violation assigned?								
High Priority Queries								
24	New Rule Violation Completeness Reporting (GWR, LCRSTR, Stage 2, LT2, and 141.130(c) operator certification treatment technique requirements)	R5 High Priority	PWSS DM	(Updated quarterly by Region 5)	Quickr: R5 high priority query—new rule completeness reporting	None.	N/A—this query pulls all violations for the new rules ever reported for any system type	October 2014 (active systems only): LT2 : 25 TT violations GWR : 3 TT, 360 M/R, and 1 other violation Stage 2 : 23 MCL and 178 M/R violations LCRSTR : 451 M/R violations Stage 1 : 0 type 12 TT violations

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
25	GW Sanitary Survey Completeness	R5 High Priority	PWSS Sanitary Surveys GWR	(Updated in April and October by Region 5) NOTE: This is a national measure beginning in FY14.	Quickr: R5 high priority query—ground water sanitary survey completeness	None.	CY (e.g., July 2014 data will include CWS sanitary surveys completed between 1/1/11 and 12/31/13 and NCWS sanitary surveys completed between 1/1/10 to 12/31/14) ⁴	As of October 2014, 86.65% of the ground water CWSs (811 out of 936) completed sanitary surveys between CY2012 and CY2014. In addition, 92.74% of the ground water NTNCWSs (588 out of 634) and 93.2% of the ground water TNCWSs (2,452 out of 2,631) have completed sanitary surveys between CY2010 and CY2014.
26	Late TCR Rule Reporting	R5 High Priority	PWSS DM TCR	(Updated annually in October by Region 5)	Quickr: R5 high priority query—late TCR reporting	None.	CY	CY2012-2013: As of October 2014, the CY2012 to CY2013 data indicate that 99.8% of TCR violations were reported on time in 2012 (2012 total: 1,037), and 99.5% of TCR violations were reported on time in 2013 (2013 total: 885). Ohio is commended for continuing this achievement!
27	Late Nitrate Rule Reporting	R5 High Priority	PWSS DM NO ₂ /NO ₃	(Updated annually in October by Region 5)	Quickr: R5 high priority query—late nitrate rule reporting	None.	CY	CY2012-2013: As of October 2014, the CY2012 to CY2013 data indicate that 83.1% of nitrate violations were reported on time in 2012 and 16.9% were reported one quarter late (2012 total: 77). In 2013, 82% of nitrate violations were reported on time, and 18.8% were reported one quarter late (2013 total: 89).
28	Arsenic MCL Non-compliance (% CWS/NTNCWS systems in violation)	R5 High Priority	PWSS As	Quickr: R5 high priority query—	None.		This query is based on data in the 4th quarter	As of January 2015, 5 systems had arsenic MCLs that were not RTC'd, including 0.33% of CWSs (4 out of

⁴ This will be measured in July 2013 for CWSs surveys completed between 1/1/10 to 12/31/12, in July 2014 for NCWSs surveys completed between 1/1/10 to 12/31/14, and then every year after that (with rolling three-year periods).

FY2014 OHIO EPA PWSS PROGRAM MEASURES AND INDICATORS END-OF-YEAR SUMMARY

#	Description	Type	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
				arsenic MCL non-compliance			national program measure tables (e.g., the January 2014 query covers the period from 10/1/2012 to 9/30/2013).	1,221) and 0.04% of TNCWSs (1 out of 2,765). There were no NTNCWSs with arsenic violations not RTC'd.

OHIO ENVIRONMENTAL PROTECTION AGENCY
FY2014 DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN (ARDP)
END-OF-YEAR REPORT
Federal Fiscal Year 2014 October 1, 2013 to September 30, 2014)

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Not all state Public Water System Supervision (PWSS) programs have access to enough resources to implement all of the provisions of existing drinking water regulations, and other primacy program requirements. Therefore, we need to plan for circumstances where resources are inadequate to implement the entire drinking water protection program. Since the purpose of the Safe Drinking Water Act (SDWA) is to protect public health, federal and state agencies have an obligation to ensure that limited resources are deployed in a way that ensures maximum health protection benefit, and that we collectively keep track of what is and is not being done as we strive for full implementation.

The plan documents what will and will not be done during the year. However, this FY14 work plan is different from previous years in that it only highlights the program areas where there are discrepancies between the federal requirements and state implementation. These are noted with an asterisk (*) in the state/U.S. EPA evaluation column. **If there is no asterisk in a particular row, Ohio is considered to be fulfilling that requirement without any discrepancies.**

Additional information about the implementation of Ohio’s PWSS program can be found on the [Region 5 State PWSS Programs Quickr site](#) at: <https://epaqpx.rtp.epa.gov/Region5statepwssprograms> (see each of the activity summaries in the “Ohio” room). The agreement reflects state capacity based on available resources, as well as local health protection priorities. Core activities, such as explaining regulation requirements to public water supplies, and tracking and reporting violations, are fundamental to the integrity of the public health protection program and are not amenable to priority setting. U.S. EPA will participate and support state implementation efforts where appropriate and possible. U.S. EPA commitments in support of state programs are listed in the table.

The state and U.S. EPA will both report annually on their accomplishments so we can jointly appraise our effectiveness, and our progress toward implementing the complete program. Where resource shortfalls continue to exist, the state and EPA will simultaneously continue efforts to obtain additional resources in order to fill the resource gap. State and EPA efforts to obtain additional resources necessary to fill the gaps associated with temporarily disinvested activities will be documented in the end-of-year evaluation reports.

Using this resource deployment plan as a framework for annual planning and progress assessment should meet several objectives:

- (1) Promote clear understanding of both state and U.S. EPA commitments.
- (2) Minimize ad hoc requests for program reporting.
- (3) Promote judicious use of limited resources to achieve the best possible public health protection.
- (4) Support efforts to increase resources by clearly identifying resource and program constraints.
- (5) Promote collaborative inter-agency program planning and implementation.

PUBLIC WATER SYSTEM SUPERVISION PROGRAM
CORE STATE ACTIVITIES

- ⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that states must expand their labs to perform all the analyses. At a minimum, a state should have an adequate certification program to certify commercial labs within the state.
- ⇒ Maintain a data management system that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
- ⇒ Keep adequate records of pertinent state decisions.
- ⇒ Adopt all rules in a timely manner (within two year extension period).
- ⇒ Notify all systems of regulatory requirements and respond to questions.
- ⇒ Determine violations for all rules and report to U.S. EPA.¹
- ⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
- ⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.

¹ States must report actions and sample data quarterly and inventory data at least annually in accordance with 40 C.F.R. 140.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. The reporting schedule for States to the national database, SDWIS/FED-ODS, is as follows: FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15. If the data is not reported within 60 days, the Region will raise the issue to the State Director's attention.

CORE R5 ACTIVITIES

- ⇒ Respond to questions from our state programs about regulations. Train state staff about regulations by offering in-state and/or regional training opportunities.
- ⇒ Maintain a forum for U.S. EPA and state communications through the monthly U.S. EPA and state conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.

- ⇒ Determine whether primacy applications are completed, track primacy submittal/review for all rules, and provide comments on draft rules, as requested.
- ⇒ Communicate and track reporting required for new rules by state.
- ⇒ Assist states in acquiring resources to carry out all functions of the PWSS program.
- ⇒ Monitor specific regulations related to state follow-up to the findings of the last data and enforcement verification reports, as indicated in the “R5 Activities” column.

Acronyms/Abbreviations	
ACS – Annual Commitment System	MRDL – Maximum Residual Disinfectant Level
ARDP – Annual Resource Deployment Plan	NCWS – Non-Community Water System
CCR – Consumer Confidence Report	NPDWR – National Primary Drinking Water Regulation
C.F.R. – Code of Federal Regulations	NPDWR CDVRT – Compliance Determination and Violation/Enforcement Reporting Tool
CPE – Comprehensive Performance Evaluation	NTNCWS – Non-Transient Non-Community Water System
CTA – Comprehensive Technical Assistance	OCCT – Optimal Corrosion Control Treatment
CWS – Community Water System	PN – Public Notification
DBP – Disinfection By-Products	PWS – Public Water System
D/DBPR – Disinfectants and Disinfection By-Products Rule	PWSID – Public Water System Identification
DWSRF – Drinking Water State Revolving Fund	PWSS – Public Water System Supervision
eDV – Electronic Data Verification (Tool)	RTCR – Revised Total Coliform Rule
ERG – Expense Reimbursement Grant	SDWA – Safe Drinking Water Act
ERP – Enforcement Response Policy	SDWIS/FED – Safe Drinking Water Information System/Federal
ETT – ERP Enforcement Targeting Tool	SDWIS/State – Safe Drinking Water Information System/State
FBRR – Filter Backwash Recycling Rule	SOC – Synthetic Organic Contaminant
GWR – Ground Water Rule	SOX – “SOX” is a code in SDWIS/FED that indicates the state entered a return to compliance for a violation
GWS – Ground Water System	SPM – U.S. EPA Region 5 Ground Water and Drinking Water Branch State Program Manager
GUDI – Ground Water under the Direct Influence of Surface Water	Stage 2 – The Stage 2 Disinfectants and Disinfection By-Products Rule
IESWTR – Interim Enhanced Surface Water Treatment Rule	SWI – Sustainable Water Infrastructure
IOC – Inorganic Contaminant	SWP – Source Water Protection
LCR – Lead and Copper Rule	SWTR – Surface Water Treatment Rule
LCRSTR – Lead and Copper Rule Short-term Revisions	TCR – Total Coliform Rule
LT1ESWTR – Long-Term 1 Enhanced Surface Water Treatment Rule	TMDL – Total Maximum Daily Load
LT2ESWTR – Long-Term 2 Enhanced Surface Water Treatment Rule	TT – Treatment Technique
MCL – Maximum Contaminant Level	VOC – Volatile Organic Contaminant
M/R – Monitoring/Reporting	
MRDL – Maximum Residual Disinfectant Level	

Annual Resource Deployment Plan Table of Contents

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Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.1 – Submit primacy applications and revisions as necessary. <i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i>	See the “OH Rules and Primacy” summary on the Quickr site for information about the status of primacy applications.		
1.2 – Notify all surface water and GUDI systems of their LT2 regulatory requirements.		As requested, promote understanding of surface water treatment regulations by conducting presentations at state water industry organization functions.	
1.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules.			
1.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all surface water systems.		R5 will evaluate the extent to which LT2 violations are reported to SDWIS/FED.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>1.5 – Conduct and report sanitary surveys at surface water (40 C.F.R. Part 141 Subpart H) systems. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection (SWP) and Sustainable Water Infrastructure (SWI) activities (see section 4.0 of the “other activities” table and section 1.0 of the “national and regional EPA priorities” table below, respectively).</p>		<p>Provide training, as requested.</p> <p>R5 will measure completeness of sanitary surveys within evaluation time period (three or five years). This national measure will be measured again in July 2013 for the period of 2010 to 2012 and in July 2014 for the period of 2011 to 2013.</p>	<p>*Ohio EPA is not reporting sanitary survey violations at systems when the state does not conduct a sanitary survey within the federally required intervals.</p> <p>Region 5 tracks progress related to state and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments.</p>
<p>1.6 – Ensure that all surface water and GUDI systems that notify the State that they recycle spent filter backwash water, thickener supernatant, or liquids from dewatering processes, return these flows through the processes of a system’s existing conventional or direct filtration system, or at alternate location approved by the State.</p>			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.7 – Use sanitary surveys, CPEs, other inspections, or other activities to evaluate recycled backwash water practices when they occur at surface water and GUDI systems. When those practices are not in compliance with the FBRR require the system to modify the practices to achieve compliance.			
1.8 – Ensure that filter/disinfection practices are adequate to achieve inactivation/removal requirements for regulated microbial contaminants found in surface water sources.			
1.9 – Follow-up on turbidity TT and individual filter turbidity M/R violations. a. Track individual filter turbidity trigger exceedances. b. Track completion of individual filter turbidity profiles for systems exceeding individual filter triggering criteria.		Region 5 will assist as necessary, or as requested.	
1.10 – When required by rule: (a) track the completion of CPE/CTA for PWSs and (b) ensure that disinfection profiling and benchmarking is conducted.			
1.11 – Ensure that a residual disinfectant concentration is measured according to rule requirements.			
1.12 – Follow-up on disinfection residual TT and M/R violations.		Region 5 will assist as necessary, or as requested	

Table 1. Privacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.13 – Report treatment data (e.g., treatment codes for all surface water, GUDI, and purchased GUDI sources, seller's PWSID number for purchased surface water and purchased GUDI sources, etc.)			

Table 1. Privacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Total Coliform Rules			
2.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR. Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).			
2.2 – Electronically report all TCR MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.			
2.3 – Follow-up on all MCL and M/R violations and determine a proper course of action to ensure public health protection.		Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Total Coliform Rules			
<p>2.4 – Ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of SWP and SWI activities (see section 4.0 of the “other activities” table and section 1.0 of the “national and regional EPA priorities” table below, respectively).</p>			*Ohio EPA is not reporting sanitary survey violations at systems when the state does not conduct a sanitary survey within the federally required intervals.
2.5 – Plan for the transition from TCR to the Revised Total Coliform Rule (RTCR) to ensure that adequate resources are dedicated such that the state can begin implementing RTCR by April 1, 2016.	<i>Please provide the state’s schedule for implementing the RTCR.</i>	R5 will provide a series of webinar training sessions for the states.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
3.1 – Submit primacy applications and revisions as necessary. <i>Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</i>	<i>Please insert actual or anticipated dates for state adoption and final primacy applications. See the "OH Rules and Primacy" summary on the Quickr site for information about the status of primacy applications.</i>		
3.2 – Notify all public water systems of their GWR regulatory requirements		As requested, promote understanding of the GWR by conducting presentations at state water industry organization functions after promulgation.	
3.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.	<i>For IL, IN, MI CWS, OH: States to relay to Region 5 any issues with limited SDWIS/State rule tracking functionality.</i>	Region 5 commits to communicate any issues our states have with limited SDWIS/State rule tracking functionality to HQ via the national GWR workgroup.	
3.4 – Electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.		R5 will evaluate the extent to which GWR violations are reported to SDWIS/FED.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
<p>3.5 – Conduct and report sanitary surveys that meet requirements by 12/31/12 at CWSs and then every 3 years thereafter, and by 12/31/14 at NCWSs served by a groundwater source and then every 5 years thereafter. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of SWP and SWI activities (see section 4.0 of the “other activities” table and section 1.0 of the “national and regional EPA priorities” table below, respectively).</p>		R5 will measure completeness of ground water sanitary surveys within evaluation time period (three or five years).	*Ohio EPA is not reporting sanitary survey violations at systems when the state does not conduct a sanitary survey within the federally required intervals.
3.6 – Ensure that GWSs that must treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.			

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
3.7 – Determine appropriate corrective actions in consultation with GWSs that collect fecal indicator-positive source water sample(s) or that have significant deficiencies.			
3.8 – Determine if optional source water monitoring will be used. If so, apply monitoring requirements to selected systems.			
3.9 – Follow-up on, and return to compliance: (a) corrective action consultation and reporting violations, (b) TT violations, (c) M/R violations, (d) public notification violations, and (e) other discovered recordkeeping/reporting violations.		Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Nitrate and Nitrite			
4.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and tracks nitrate/nitrite violations. Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).			

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Nitrate and Nitrite			
4.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.			
4.4 – Follow-up on all MCL and M/R violations and determine a proper course of action to ensure public health protection.		Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
5.1 – Submit primacy applications and revisions as necessary. Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).	States to provide comments on the proposed LCR long-term revisions (LCR LTR), as appropriate. See the “OH Rules and Primacy” summary on the Quickr site for information about the status of primacy applications.	The LCR LTR proposed rule should be published in FY2014. R5 will provide training on the proposal and requests for comment. R5 is working on addressing some of the consumer notice violations at schools and day cares that are PWSs through the small system initiative.	
5.2 – Incorporate rule revisions into state oversight and enforcement operations.			
5.3 – Notify all CWSs and NTNCWSs of their LCRSTR regulatory requirements			
5.4 – Maintain a data base management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs.			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
5.5 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90 th percentile action level sample data for all large and medium sized systems, and 90 th percentile action level exceedance sample data for small systems.	<i>Indicate the state's schedule for full implementation, if the state is not fully implementing the LCRSTR lead consumer notification requirement to (1) notify systems of the lead consumer notice requirement to provide the results to the consumer and (2) track and report violations. See Tom Poy's January 13, 2012, e-mail requesting that states develop a plan for full implementation of this requirement by April 1, 2012.</i>		
		<p>R5 will evaluate the extent to which LCRSTR violations are reported to SDWIS/FED.</p> <p>R5 expects that compliance determination and violation reporting training (CDVRT) will be conducted when all of the CDVRT modules are completed. The completion of the modules has been delayed; R5 anticipates releasing the CDVRT in the future.</p>	
5.6 – Designate OCCT and follow-up on OCCT installation violations at all required PWSs.			
5.7 – Follow-up on all M/R violations.		Region 5 will assist as necessary, or as requested.	
5.8 – Set optimal water quality parameter ranges and/or minimum values for all CWSs and NTNCWSs where required by the LCR.			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.1 – Submit primacy applications and revisions as necessary. <i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i>	See the “OH Rules and Primacy” summary on the Quickr site for information about the status of primacy applications.		
6.2 – Notify all CWSs and NTNCWSs (serving greater than 10,000 people) delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their Stage 2 regulatory requirements.		Region 5 will handle and close out all enforcement actions that we’ve initiated and will continue to take enforcement actions until at least the point of state rule adoption. Once the state has adopted the rule, Region 5 will be available to assist with any enforcement actions needed.	.
6.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the D/DBP rule.			
6.4 – Electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/FED for all public water systems, including operator certification treatment technique violations per 141.130(c).		R5 will evaluate the extent to which Stage 2 violations and 141.130(c) operator certification treatment technique violations are reported to SDWIS/FED.	*Ohio EPA is not reporting 40 CFR 141.130(c) operator certification treatment technique violations—that is, type 12 violations for failure to have a certified operator as required by the Stage 1 Disinfectants and Disinfection Byproducts Rule (D/DBPR). Ohio does issue violations for failure to have an operator, but they are not DBP treatment technique violations.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.5 – Follow-up on: (a) all MCL/MRDL violations, including chlorine dioxide MRDL violations; (b) all M/R violations; (c) all other reporting requirement violations.		Region 5 will assist as necessary, or as requested.	
6.6 – Ensure that Subpart H systems using conventional filtration operate in compliance with the DBP precursor control treatment technique requirements.		Region 5 will assist as necessary, or as requested.	
6.7 – Determine which systems do not qualify for reduced monitoring and inform them they must return to the routine monitoring frequency.			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – IOCs (including Arsenic)			
7.1 – Adopt all rule changes in a timely manner (within two year extension period). Submit primacy applications and revisions as necessary. Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).	See the “OH Rules and Primacy” summary on the Quickr site for information about the status of primacy applications.		
7.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – IOCs (including Arsenic)			
IOCs.			
7.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.		R5 will evaluate arsenic MCL non-compliance as reported in SDWIS/FED.	
7.4 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.		Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
8.0 – Radionuclides (including Radon)			
8.1 – Submit primacy applications and revisions as necessary. <i>Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</i>	See the "OH Rules and Primacy" summary on the Quickr site for information about the status of primacy applications.		
8.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for radionuclides.			
8.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs.			
8.4 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.		Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
9.0 – SOC's			
9.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the SOC's. <i>Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</i>			
9.2 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.			
9.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.		Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
10.0 – VOCs			
10.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system info), and violations for VOCs. Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).			
10.2 – Electronically report all VOC MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.			
10.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.		Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
11.0 – Organic and Inorganic Chemical Monitoring Waiver Program			
11.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval. Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).			

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
12.0 – Sodium			
12.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for sodium M/Rs. Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).			
12.2 – Notify appropriate local and State health departments of the sodium levels in CWS drinking water.			
12.3 – Follow-up on M/R violations.		Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
13.0 – Public Notification			
13.1 – Notify all public water systems of their public notification requirements. Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).			
13.2 – Maintain a data base management system that accurately tracks PN violations.			
13.3 – Electronically report all public notification violations to SDWIS/FED.			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
13.0 – Public Notification			
13.4 – Follow-up on all Tier 1 violations.		Region 5 will assist as necessary, or as requested.	<p>*Ohio EPA reports federal Tier 1 PN violations. Ohio EPA does track the request for PN and when the PN is received for Tier 2 and 3 violations, but does not report these PN violations. Ohio is working with the district offices to ensure consistent implementation of Tier 1 PN violations. Ohio will not expand the PN violation program until full implementation of the Tier 1 program is complete.</p> <p>Region 5 tracks progress related to state and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments.</p>
13.5 – Follow-up on all Tier 2 violations.		Region 5 will assist as necessary, or as requested.	See row 13.4.
13.6 – Follow-up on all Tier 3 violations.		Region 5 will assist as necessary, or as requested.	See row 13.4.

Table 1. Privacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
14.0 – CCR			
14.1 – Notify all regulated water systems of their CCR requirements. <u>Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</u>		A memorandum signed on January 3, 2013, clarifies electronic delivery options for CCRs (see http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/ccrdeliveryoptionsmemo.pdf).	
14.2 – Maintain a data base management system that accurately tracks CCR violations.			
14.3 – Electronically report all CCR violations to SDWIS/FED.			
14.4 – Enforce the rule when the water system has not issued a CCR or issued one with insufficient content.		Region 5 will assist as necessary, or as requested.	<p>*Ohio EPA conducts content reviews for specific CCRs based on priority targeting criteria and sends notices of violation (NOVs) for incorrect CCRs. However, Ohio EPA does not report content violations to U.S. EPA. NOVs are sent to systems failing to issue a CCR, and Ohio EPA reports these violations to U.S. EPA. Further enforcement is not prioritized unless included as part of another enforcement action.</p> <p>Region 5 tracks progress related to state and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
15.0 – Laboratory Certification			
<p>15.1 – All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 C.F.R. parts 141 and 142. Guidance for these certifications is provided in the EPA <u>Manual for the Certification of Laboratories Analyzing Drinking Water</u>, Fifth Edition. Third parties may be used to conduct the on-site inspections of the laboratories, but the certifications must be issued by an appropriate State official.</p> <p>EPA recommends that the State has a process for ensuring capacity to analyze at the Principal State Lab or commercial labs all NPDWR parameters that are required to be sampled in the State.</p> <p>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</p>		R5 expects to conduct lab audits and program reviews in OH and WI in FY14.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
15.0 – Laboratory Certification			
<p>15.2 – In order to maintain primacy, the States must comply with 40 CFR 142.10, which includes the following provisions:</p> <p>142.10(b)(3)(i) – The establishment and maintenance of a State program for the certification of laboratories conducting analytical measurements of drinking water contaminants pursuant to the requirements of the State primary drinking water regulations including the designation by the State of a laboratory officer, or officers, certified by the Administrator, as the official(s) responsible for the State’s certification program.</p> <p>142.10(b)(4) – Assurance of the availability to the State of laboratory facilities certified by the Administrator and capable of performing analytical measurements of all contaminants specified in the State primary drinking water regulations.</p>			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
<p>16.1 – Participate with R5 in compliance and enforcement planning actions including referrals, Enforcement Verification audits, and state compliance and enforcement strategy updates.</p> <p>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</p>	<p><i>Each State should include whether its strategy is current/relevant and if not, its plan to update it.</i></p>	<p>In 2014, R5 will conduct EV audits in OH and IL, as resources allow.</p>	
<p>16.2 – The State will conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities and to address or resolve ERP priority systems within six months after being identified as priorities.</p>		<p>Assist with enforcement referrals, enhanced data exchange, analysis, data clean up, or other joint efforts as requested by state.</p> <p>R5 is working on addressing some of the consumer notice violations at schools and day cares that are PWSs through the small system initiative.</p>	
<p>16.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.</p>	<p><i>Each state should note any disinvestments already agreed to or alternative approaches or disinvestments to discuss.</i></p>	<p>Assist with enforcement referrals, analysis, data clean up, or other joint efforts as requested by state.</p>	
<p>16.4 – The State will send R5 an update on compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.</p>		<p>Each quarter, R5 will send the states updated ERP reports requesting a state update. R5 will integrate State updates into reports before the next request is sent out.</p>	

Table 1. Privacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
16.5 – Electronically report state formal enforcement actions, return to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link to all appropriate violations helps ensure an accurate ERP list.	The State will update SDWIS/FED with this information quarterly, and link ERP addressing enforcement actions, and/or SOX dates to violations as appropriate such that SDWIS/FED accurately represents those actions for each violation affected.		
16.6 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Commit to address and resolve a specific number of systems between July 2013 and June 2014.		R5 will track state commitments under measure SDWA02 and update state quarterly, engaging in discussion with states on progress as needed.	

Table 1. Privacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
17.0 – Data Management and Reporting			
<p>17.1.a – State must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. The State must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, States should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region.</p> <p>17.1.b – For States using SDWIS/State, if they are not using the most current version of SDWIS/State, they should commit to a timeframe for when that would happen. In addition, the State should list those modules they are not using at all or not fully utilizing and describe the State’s plans or schedule to use them.</p> <p>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</p>	<p>For each data submission with errors, the State will contact the Region about their plans for fixing the errors.</p>	<p>Provide technical assistance and program assistance to all Region 5 States related to data management.</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
17.0 – Data Management and Reporting			
17.2 – Continue to improve inventory reporting to SDWIS/FED focusing primarily on inventory data quality errors and improving locational data for CWS intakes, wells, and treatment plants for increased emphasis on Regional emergency response needs.		Headquarters is working on revising an inventory reporting guidance document. R5 will share this document with states when it's available.	
<p>17.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan):</p> <p>17.3.a – State will commit to full automation including electronic reporting from labs and automated monitoring schedule generation and system notification.</p> <p>17.3.b – State will automate the compliance determinations for all rules for which it has primacy.</p> <p>17.3.c – State will update standard operating procedures, as necessary, to ensure proper compliance determinations are being made.</p> <p>17.3.d – State will provide timely compliance determination training to staff, particularly for new rules.</p> <p>17.3.e – The State will ensure the accuracy of the service area reporting for school and daycare PWSs and make revisions as</p>	<p>Since data management is critical to each State's ability to maintain primacy, the State shall send a representative to the annual ASDWA Data Management Users conference.</p>	<p>R5 will evaluate the extent to which TCR and nitrate violations are reported late to SDWIS/FED.</p> <p>R5 expects that compliance determination and violation reporting training (CDVRT) will be conducted when all of the CDVRT modules are completed. The completion of the modules has been delayed; R5 anticipates releasing the CDVRT in the future.</p> <p>Region 5 will assist states with resolving data quality issues, as appropriate and resources allow.</p> <p>Region 5 requests that states copy the region when responding to the annual headquarters survey asking about which states are using various SDWIS/State components.</p>	

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
17.0 – Data Management and Reporting			
necessary. 17.3.f – The State will correct identified data errors such as violations with compliance period begin dates that are reported after a PWS’s deactivation date.			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
18.0 – Annual Compliance Report			
18.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report. Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).	Due Dates: 7/1/13 and 7/1/14	OECA to provide annual ACR guidance. R5 will forward guidance when received.	
19.0 – Variances and Exemptions			
19.1 – Follow all variance and exemption requirements when variances and exemptions are allowed by the State.	Variances and exemptions are not allowed in Ohio.		

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation		
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals					
20.1 – Gather information to track strategic plan progress. State directors will attend the annual Region 5 state directors meeting in April 2014 to discuss primacy and implementation issues. Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).	Report on status of state’s commitments for measures in U.S. EPA’s strategic plan. Note: The shared goals were revised in CY12 for the FY13 work plan.	Compile information and report to HQ. Annually assess each State’s progress in attaining the shared goals milestones, and identify U.S. EPA or State follow-up actions needed to maintain or improve compliance. Negotiate appropriate disinvestments with States as necessary to ensure that the highest priority work is done.	Milestone 1 Milestone 2 Milestone 3 Milestone 4 Milestone 5 Milestone 6 Milestone 7	Goal: ≥95% ≥95% <5% <10% <5% <10% <10%	EOY:

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals			
		<p>Work with State Drinking Water and Ground Water Programs to increase public understanding of the impacts of budget cuts on public health protection efforts, and assist in state efforts to gain additional program resources.</p> <p>R5 will schedule semi-annual conference calls about every six months to discuss status updates and issues regarding state-specific topics.</p>	

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Preparing for Security Threats at PWSs			
1.1 – The state has adopted and can implement an adequate plan for the provision of safe drinking water under emergency circumstances including, but not limited to, earthquakes, floods, hurricanes, and other natural disasters.			

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Operator Certification			
<p>2.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of the Operator Certification Program to avoid 20% withholding of the DWSRF capitalization grant.</p> <p>Due Dates – September 30, 2013 and September 30, 2014</p> <p><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></p>		<p>Coordinate information and issues on Op Cert Program implementation and review and approve annual reports.</p>	
<p>2.2 – For operators of CWSs and NTNCWSs: (1) provide training and certification opportunities for new operators, and (2) provide training and opportunities for upgrading and renewing certification for existing operators.</p>			

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Operator Certification			
2.3 – Provide supplemental certification and training to water system operators on relevant “Sustainable Water Infrastructure” topics from section 1.0 of the “EPA national and regional priorities” table of the ARDP to ensure sustainable water utilities and water supplies. For example, conduct CEU-eligible training to water operators on supply/demand water efficiency or add supplemental questions on treatment plant energy efficiency activities to certification exams.		Region 5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with states.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Capacity Development			
<p>3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures.</p> <p>Due Date – September 30th</p> <p>3.2 – Submit a report to the governor and provide a copy to U.S. EPA on the efficacy of the strategy and the progress made toward improving the capacity of water systems in the state.</p> <p>Due Date – October 1, 2014</p> <p><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></p>		<p>Region 5 will send a reminder to the State about the capacity development annual report in August annually.</p> <p>Region 5 will send a reminder to the State about the report to the governor in August 2014.</p>	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Capacity Development			
3.2 – Promote “Sustainable Water Infrastructure” activities as described in section 1.0 of the “national and regional EPA priorities” table of the ARDP in Capacity Development activities and assessments as part of improving the capacity and sustainability of water systems and water supplies. For example, provide technical assistance on starting an asset management program or conduct energy audits for treatment plants.		Region 5 SWI workgroup will provide training and outreach materials and assistance on tools (i.e., Check Up Program for Small Systems (CUPSS)) to water system operators and technical assistance providers, in coordination with states.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
4.1 – Update source water assessments, as resources allow. Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).			

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
4.2 – Assist local community source water protection (SWP) plan preparation and implementation in cooperation with Source Water Collaborative (SWC) members (e.g., National Rural Water Association, American Planning Association, and others).	SWP plan development and implementation will be achieved with assistance from the following SWC partners: <i>[States, please add state SWC partners here.]</i>	<p>Continue to develop tools as needed, foster cross-program coordination, and encourage coordination with SWC partners to encourage broad-based actions at the state and local levels to address potential sources of contamination.</p> <p>Facilitate the development and expansion of State-SWC partnerships. Provide feedback and guidance.</p> <p>Encourage interstate communication through conference calls and an annual State–R5 EPA meeting. The last meeting was held in Chicago in April 2014.</p> <p>Encourage data sharing with other programs to prioritize permitting and compliance activities in source water areas, for example.</p>	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
<p>4.3 – Report the number of CWSs with SWP plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible).</p> <p>For states that do not report via SDWIS, R5 requests that States voluntarily provide a list of system names and/or PWSID numbers that have SWP plans in place and a list of system names and/or PWSID numbers that are substantially implementing SWP as defined by the State as of the end of FY 2014 on June 30, 2014 by August 15, 2014.</p>		Maintain and update State information in the Region 5 portion of the annual SWP report to EPA-HQ.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
4.4 – Develop and implement coordinated approaches with other regulatory and voluntary programs to protect both the quality and quantity of source water, particularly in areas of concern.	<i>Please specify efforts the State will take in FY 2014 to reduce nutrient and harmful algae growth impacts to source water protection areas.</i>	<p>Provide training, technical assistance, and technology transfer capabilities.</p> <p>Facilitate the adoption and sharing of Geographic Information System databases to support local decision making.</p> <p>Work with Clean Water Act program to encourage assessment of surface waters for drinking water use, prioritize impaired waters, develop TMDLs, and develop tailored approaches to achieve substantial implementation. Review state 303(d) and 305(b) reports (or integrated reports) to recommend opportunities for source water protection.</p> <p>Enhance SWP integration elements like the watershed approach, stormwater management, and prioritized enforcement inspections based on SWP.</p> <p>Work with the state to characterize current and future pressures on source water quality and availability. Support voluntary programs such as WaterSense and other Sustainable Infrastructure activities to protect water resources.</p>	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
4.5 – Develop and expand SWP program implementation mechanisms, where possible.		Promote the innovative use of DWSRF set-asides and other potential program funding streams.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report			
<p>5.1 – Review the draft report prepared by R5 and assist in filling gaps related to the State’s PWSS program to support the various components of the PWSS program implementation logic model.</p> <p><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></p>		<p>Use the logic model to improve our ability to understand, measure, assess, and communicate progress.</p> <p>SPM will work with state program to determine state-specific approach, and schedule.</p>	

Table 3. National and Regional EPA Priorities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Sustainable Infrastructure			
<p>1.1 – Enable water system and water supply sustainability by providing incentives through DWSRF set-asides and grant criteria, providing training, and encouraging sustainable water infrastructure (SWI) activities including, for example, those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this work plan, including source water protection, DWSRF, operator certification, capacity development, and all-hazards resilience approaches, etc.</p> <p>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</p>	<p><i>Please include the state’s commitment, either ongoing or future, to document support for sustainable infrastructure initiatives. Examples might include the dedication of a coordinator, or a statement of intent to hold or participate in a water efficiency, sustainable water infrastructure, or climate change conference.</i></p>	<p>Region 5 staff participate in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense.</p> <p>Region 5 staff participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives.</p> <p>R5 to contact states to identify what, if any, sustainable water infrastructure/climate change efforts are a priority.</p>	

Table 3. National and Regional EPA Priorities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Environmental Justice			
<p>2.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice.</p> <p>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</p>	<p><i>Please include the state’s commitment, either ongoing or future, to document support for environmental justice efforts.</i></p>	<p>R5 has the capability to provide states with draft GIS maps that show areas with environmental justice concerns through EJSCREEN, which we anticipate will be introduced to the states by summer 2015.</p> <p>States currently have access to the public tool, EJView, available online at: http://epamap14.epa.gov/ejmap/entry.html.</p>	

Attachment A: Linking the Strategic Plan to this Work Plan

This continuing program grant is consistent with U.S. EPA’s Strategic Plan Goal 2: Clean and Safe Water, which calls for protecting public health by providing safe drinking water. Many of the grant work plan activities contribute to the goal of assuring that people served by public water systems receive drinking water that meets all applicable standards through effective treatment and source water protection. Continuing program implementation includes adopting rules at least as stringent as federal regulations, providing assistance to public water systems on regulatory requirements, conducting sanitary surveys, ensuring that monitoring and follow-up is conducted, and enforcing regulations.

**Table A. Final FY 2014 National Water Program Guidance:
OW and OECA National Program Manager (NPM) Guidance Targets and Program Activity Measures¹**

OW ACS code	Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink
SDW-211	By FY2014, 92 percent of the population served by CWSs will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. <i>State FY14 target: 94 percent; end-of-year (EOY): 93.1 percent</i>
SDW-SP1.N11	By FY2014, 90 percent of the CWSs will meet all applicable health-based standards through approaches that include effective treatment and source water protection. <i>State FY14 target: 93 percent; EOY: 94.2 percent</i>
SDW-SP2	By FY2014, CWSs will provide drinking water that meets all applicable health-based drinking water standards during 95 percent of “person months” (i.e., all persons served by CWSs times 12 months). <i>State FY14 target: 96 percent; EOY: 97.5 percent</i>
SDW-SP4a	By FY2014, minimize risk to public health through source water protection for 45 percent of CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). <i>State FY14 target: 43 percent; EOY: 50 percent</i>
SDW-SP4b	By FY2014, minimize risk to public health through source water protection for 57 percent of the population served by CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). <i>State FY14 target: 65 percent; EOY: 66 percent</i>
SDW-01a	By FY2014, 79 percent of CWSs that have undergone a sanitary survey within the past three years (five years for outstanding performers or those ground water systems approved by the primacy agency to provide 4-log treatment of viruses). <i>State FY14 target: 79 percent; EOY: 99.6 percent</i>
SDW-04	In FY2014, achieve an 89 percent fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF). <i>No state-specific targets.</i>
SDW-05	The number of DWSRF projects that have initiated operations (cumulative). <i>No state-specific targets.</i>
SDW-11	Percent of DWSRF projects awarded to small PWSs serving <500, 501-3,300, and 3,301-10,000 consumers. This is an indicator that HQ reports.
SDW-15	Number and percent of small CWSs and NTNCWSs (<500, 501-3,300, 3,301-10,000) with repeat health-based Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR violations. This is an indicator that HQ reports. <i>State FY14 EOY: 1.7% (31 out of 1,778)</i>

SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards. This is an indicator that HQ reports. <i>State FY14 EOY: 93.2% (275 out of 295)</i>
OECA ACS code	Goal 5: Compliance and Environmental Stewardship Subobjective 5.1.2: Address Environmental Problems from Water Pollution
SDWA02	During FY2014, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2013 ETT report. State, territory, and tribal breakouts shall be indicated in the comment field of the Annual Commitment System. Please note: A primacy agency's success at addressing violations will be tracked by means of the quarterly ETT reports. Numerical targets may be adjusted at mid-year. While it remains the ERP's goal that all of a priority system's violations will be returned to compliance, a primacy agency has met its commitment under the 2014 SDWA ACS with respect to a priority system if the score for that system has been brought below, and remains below, eleven. <i>Ohio's 2014 commitment is to address or resolve 42 systems. As of July 2014, Ohio addressed 79 systems (33 from the original 42 on the July 2013 fixed base list plus an additional 46 that had become priority systems after July 2013). Ohio is commended for this accomplishment.</i>

¹ The information in Table A is based on final FY2014 OW and OECA measures at:
<http://www2.epa.gov/sites/production/files/documents/fy14ownpmguidance.pdf> (Appendix A) and
<http://www2.epa.gov/sites/production/files/documents/fy14oecanpmguidance.pdf> (Appendix I), respectively.